

MONTANA

Forestry Best Management Practices Monitoring



2014 FORESTRY Best Management Practices FIELD REVIEW RESULTS

Department of Natural Resources & Conservation
Forestry Division • Missoula, MT 59804-3199

MONTANA FORESTRY BEST MANAGEMENT PRACTICES MONITORING

2014 FORESTRY BMP FIELD REVIEW REPORT

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ACKNOWLEDGMENTS

In 2014 the Forestry Assistance Bureau (FAB) of the Forestry Division, Montana Department of Natural Resources and Conservation (DNRC) undertook the task of completing the Forestry Best Management Practices (BMP) Field Reviews. These have been conducted every even numbered year since 1990 as a way of determining whether Montana's voluntary Forestry Best Management Practices are effective at protecting Montana's resources. The name of this process was changed in 2010 from "AUDITS" to "FIELD REVIEWS" to more accurately reflect the activity being conducted.

The Division graciously acknowledges the many people who gave their time and energy toward the review effort. Thanks to all the Field Review Team Members who traveled extensively, worked long days in the field, tackled many difficult decisions and conducted themselves in a highly professional manner. Thanks also go out to the Environmental Quality Council, the Governor's Office, those who supplied information to select the sites, and to those who gave us access to their private lands. Thanks also to the representatives from the Forest Products Industry, the U.S. Forest Service, the Bureau of Land Management, MT Department of Natural Resources and Conservation Trust Land Management Division, University of Montana, Lubrecht Experimental Forest, MT Fish Wildlife, & Parks, and the Family Forest Landowners for their cooperation in providing field review site information and/or team members.

Special thanks to Gary Frank, Don Kasten, Brian Sugden, and Dean Sirucek, the Team Leaders who put in an extraordinary effort to assure the field work went smoothly. I would also like to thank Debra Parker Foley who assisted me in 2014 with coordinating the teams. She did the work that allowed this year's field work to run smoothly. Finally, thanks to Norm Fortunate for his assistance in putting this report together. All of these folks did an outstanding job.

Sincerely
Roger Ziesak

EXECUTIVE SUMMARY

The Forestry Best Management Practices (BMP) field review process is used to evaluate whether BMPs are being applied when appropriate, applied correctly, and are effective in limiting non-point source pollution from timber harvest operations in Montana; i.e. is water quality being protected? The DNRC Forestry Division, evaluates forest practices for BMP implementation every two years, and reports the findings to the Montana Environmental Quality Council (EQC), the Legislature, Governor's Office, and the public at large. This report summarizes the findings of Montana's 2014 Forestry BMP Field Reviews.

In 2014, three interdisciplinary teams conducted the field reviews. Ideally, each team was composed of a fisheries biologist, a forester, a hydrologist, a representative of a conservation group, a road engineer, a soil scientist, and a non-industrial private forest (NIPF) landowner or timber harvesting professional. DNRC used established site selection criteria to select forty-two (42) new timber harvest sites that were harvested in 2011 or later and were completed. The field review teams evaluated a maximum of sixty (60) BMPs, 49 of which are forestry BMPs and the remaining 11 are Streamside Management Zone (SMZ) BMPs. At each site, the teams rated the application and effectiveness for each BMP on a five-point scale.

As noted, a total of 42 field review sites were evaluated for **BMP Application**. Field Review results showed that across all ownerships, **BMPs were properly applied 97% of the time**. Although many harvest sites had at least one instance where a BMP was inadequately applied, a majority of these departures were minor and did not cause erosion or deliver material to a stream. Five percent (5%) of the sites had one or more major BMP departures in application. In the 2012 field reviews, 7% had major BMP departures in application. The application of the eight high risk BMPs were also evaluated separately because these are among those most important for protecting soil and water resources. Ninety-two percent (92%) of these high risk BMPs were properly applied.

The field review teams evaluated the same 42 sites for **BMP effectiveness**. Field review results showed that across all ownerships, **BMPs were effective in protecting soil and water resources 98% of the time**. Thirty-one percent (31%: 13 of 42) of all sites had some minor departures in BMP effectiveness. This compares with 16% in 2012. Minor departures in effectiveness produce minor impacts to soil and water resources; eroded material reaches draws, but not streams. Seven percent (7%: 3 of 42) of the sites had one or more major departures in BMP effectiveness compared to 16% in 2012. Ninety-four percent (94%) of the eight high risk BMPs evaluated were rated as providing adequate protection to soil and water resources.

Once again the greatest frequency of departures from the BMPs, and the most identified impacts, were associated with road maintenance and road surface drainage. This report includes a list of the most problematic BMPs in Table 16 on page 24.

The Field Review teams also evaluated application and effectiveness of the Montana SMZ Law. For both application and effectiveness, a total of 9 SMZ Rules departures were noted (6 for application and 3 for effectiveness) out of the 264 that were rated. Application departure ratings had 3 rated as minor and three as major. All 3 effectiveness rating departures were rated as minor and 3 of the application departures had no impacts.

Summary of 2014 BMP and SMZ Application and Effectiveness, by Ownership Group

Practice	State	Federal	Industry	NIPF	Totals
BMP Application	97.8%	94.2%	97.9%	98.3%	96.9%
BMP Effectiveness	99.6%	96.4%	98.2%	99.0%	98.2%
SMZ Application	96.1%	100%	100%	94.8%	97.7%
SMZ Effectiveness	98.0%	100%	100%	97.4%	98.9%

Comparison of BMP Field Review Results – 1990 through 2014

Category	2014	2012	2010	2008	2006	2004	2002	2000	1998	1996	1994	1992	1990
Application of practices that meet or exceed BMP requirements.	97%	98%	97%	97%	96%	97%	96%	96%	94%	92%	91%	87%	78%
Application of high risk practices that meet or exceed BMP requirements.	92%	93%	93%	90%	89%	89%	90%	92%	84%	81%	79%	72%	53%
Number of sites with at least one major departure in BMP application.	2 of 42 (5%)	3 of 42 (7%)	5 of 45 (11%)	8 of 42 (19%)	4 of 44 (9%)	5 of 39 (13%)	10 of 43 (23%)	4 of 42 (10%)	8 of 47 (17%)	12 of 44 (27%)	17 of 46 (37%)	20 of 46 (43%)	27 of 44 (61%)
Average number of departures in BMP application, per site.	0.93	0.76	0.87	1.19	1.52	1.30	1.80	1.40	2.00	3.00	3.90	5.60	9.00
Percentage of practices providing adequate protection.	98%	99%	98%	97%	97%	99%	97%	98%	96%	94%	93%	90%	80%
Percentage of high risk practices providing adequate protection.	94%	96%	96%	91%	92%	95%	92%	93%	89%	86%	83%	77%	58%
Number of sites having at least one major / temporary or minor / prolonged impact.	3 of 42 (7%)	5 of 42 (12%)	7 of 45 (16%)	8 of 42 (19%)	7 of 44 (16%)	10 of 39 (25%)	15 of 43 (35%)	9 of 42 (21%)	12 of 47 (26%)	15 of 44 (34%)	13 of 46 (28%)	17 of 46 (37%)	28 of 44 (64%)
Average number of impacts per site.	0.57	0.38	0.47	1.02	1.05	0.56	1.30	1.00	1.50	2.30	3.00	4.60	8.00

INTRODUCTION

The forest lands of Montana are the headwaters for several major river basins which produce large quantities of high quality water. This water nurtures some of the West's best fisheries and is used for irrigation and livestock, as well as for domestic, recreational and industrial purposes. These same lands grow the timber resources that sustain one of Montana's major industries; the forest products industry. All products from Montana's 22.5 million acres of forested land contribute - in an essential manner - to Montana's economy and way of life.

Montana's approach for protecting soils, habitat, and water quality during timber harvest operations involves a combination of regulatory and non-regulatory approaches. Since the 1970's, non-regulatory Forestry Best Management Practices have provided guidance as minimum protection standards. In 1987 Congress amended the Clean Water Act and added Section 319 to address non-point sources of pollution. Section 319 directed all states to develop non-point source pollution plans to address non-point source pollution problems. These Forestry BMPs provide Montana's Section 319 compliance.

At this same time, concern over the impacts of forest management on Montana's watersheds prompted the 1987 Montana Legislature to pass House Joint Resolution 49. This resolution directed the Montana Environmental Quality Council (EQC) to study *"how current forest management practices are affecting watersheds in Montana."* (Zackheim, 1988) The EQC established a BMP technical committee that developed Montana's first statewide forestry BMPs in 1987. In 1989, after two years of work, an interdisciplinary working group (BMP Working Group) released the revised Forestry Best Management Practices. Since that time, the BMP Working Group has overseen the biennial review process. In the interim between 1996 and 2010 the BMP Working Group reviewed and revised the 1989 BMPs. The last revision was to address biomass in the BMPs – these changes are minor and have no direct impact on the methodology used in the field review process. The 2004 version of the Best Management Practices for Forestry in Montana (Appendix A) was adopted for use in the 2010 field reviews and has been used since.

Forestry BMP field reviews have been conducted previously in Montana. As part of HJR-49, field review teams conducted the first statewide assessment of forest practices for BMPs during the summer of 1988 (Zackheim, 1988). In 1989 the University of Montana, under the Flathead Basin Water Quality and Fisheries Cooperative, reviewed more sites for BMPs in the Flathead River drainage (Ehinger and Potts, 1990). The Montana Legislature has directed DNRC to conduct a further series of statewide BMP field reviews every two years in the even years from 1990 (Schultz, 1990 and 1992; Frank, 1994; Mathieus, 1996; Fortunate, et al., 1998; Ethridge and Heffernan, 2000; Ethridge, 2002 and 2004; Rogers, 2006; Ziesak 2008, 2010, 2012, 2014).

Forestry BMPs, if properly applied, can limit non-point source pollution--the kind of diffuse pollution that forestry operations can produce, such as sediment from a road or timber harvest. The BMP field review process has been consistently used since 1990 to evaluate whether BMPs are being properly applied and if they are effective in limiting non-point source pollution.

Prior to 1989, forestry water quality was addressed through a voluntary approach as part of the State's 1988 non-point source assessment and management plan. In 1989 the Montana Legislature enacted the BMP Notification Law (76-13-101 MCA), which requires private landowners to notify DNRC prior to harvesting timber. DNRC then provides information and technical assistance on how to apply BMPs in the logging operation. Under this law, forestry BMP information is sent to landowners. Implementation of Forestry BMPs is administered within a non-regulatory framework.

Since October 1991 the Streamside Management Zone (SMZ) Law (77-5-301 307 MCA) has regulated forest practices along streams. This law prohibits certain forest practices along stream channels and describes/directs suitable streamside management practices. The SMZ Rules (36.11.301 - 310 ARM) became effective March 15, 1993 and were intended to help define and clarify the SMZ law. The 1992 BMP field reviews did not evaluate compliance with the SMZ law because most operations reviewed were completed prior to the effective date of the rules. Beginning in 1994, the field reviews were designed to provide information on the application and implementation of the SMZ law and rules, using a supplemental SMZ questionnaire. In 1998 the format and five-point scale used to evaluate the BMPs for application and effectiveness was also adopted for evaluating the SMZ law and rules.

The BMP field review process, which the EPA calls BMP implementation monitoring, is a widely used means of evaluating forest practices. Implementation monitoring is an acceptable surrogate for water quality monitoring which is a more quantitative, time consuming and expensive approach. Water quality varies naturally due to variable geology, landforms, soils, and climatic events. Due to this variability, investigators have to collect large numbers of samples over a long period of time to accurately characterize water quality.

In Montana interdisciplinary team members use qualitative implementation of field reviews to determine if BMPs are being applied and whether they are controlling erosion. Since BMPs are recognized by state and federal legislation as a method to control non-point source pollution, it makes sense to check the application and effectiveness of BMPs as part of such a program. States are increasingly relying on qualitative surveys, using interdisciplinary teams to assess forest practices on-site to monitor their silvicultural non-point source control programs (NCASI, 1988). California, Oregon, Washington, Idaho, Utah, Minnesota, Texas, South Carolina, and Florida all use a similar qualitative approach to assess the control of non-point source pollution from forest practices.

Montana, through the DNRC, has appointed a technical working group that has overseen the BMP process since its inception and provides recommendations to DNRC. The Working Group members represent a broad range of interests in forestry in Montana. Several members also serve on the field review teams, and several have been involved with the program since its inception in 1988.

METHODS

Objectives

BMP field reviews have been conducted every two years beginning in 1990; 2014 represents the thirteenth cycle. The 2014 field reviews were conducted with identical objectives and criteria as the previous field reviews in order to produce comparable results.

In 2014, the objectives of the BMP field reviews were to:

1. Determine if BMPs are being applied on timber harvest operations.
2. Evaluate the general effectiveness of BMPs in protecting soil and water resources.
3. Provide information on the implementation of the SMZ law and rules and assess general effectiveness of SMZs in protecting water quality.
4. Provide information to focus future educational or study efforts by identifying subjects and geographic areas in need of further attention or investigation.
5. Provide information on the need to revise, clarify, or strengthen BMPs.

The Study Area

The State of Montana is the study area. For 2014 the state was divided into three geographical regions, Northwest, West, and Central/Eastern. For administrative ease, the regional breaks are located along county lines.

Sample Size and Distribution

Historically the target for the number of sites to be reviewed was set at 45. This number was based on the interaction between the number of days the volunteer field review team members could be expected to commit to the review process and the number of field reviews a team could reasonably conduct in one day. The maximum time commitment for field review team members was established at 10 days. This is for all review-related activities, which includes calibration training, conducting the on-the-ground field reviews and a post-field season workshop. It was determined that a request exceeding 10 days would likely jeopardize the ability of individuals to participate, thus restricting the ability to field the desired number of fully-staffed teams. A field review team can be expected to complete one or two reviews per day depending on the regional distribution of sites and the travel time between sites. Based on the above expectations and assumptions, the target number was set at 45.

The targeted 45 field review sites are distributed across the state by geographical region (see Study Area above) and land ownership group. The field review process recognizes four ownership groups: 1) State of Montana Trust Lands, Lubrecht Experimental Forest (U of M) and MT Fish Wildlife & Parks are (State); 2) U.S. Forest Service/Bureau of Land Management lands are (Federal); 3) private industrial forest lands are (Industry) and 4) non-industrial private forest lands are (NIPF). The basis for field review site distribution is the proportion of the total statewide harvest volume that is harvested within each region by each ownership group. The 45 sites are allocated proportionally among the regions. Harvest volumes were obtained from the 2013 State of Montana Cut By County Report and USFS, BLM and DNRC annual harvest volume records. A total of 44 sites were selected but two were dropped during the review period for various reasons primarily associated with logistical problems or failing to properly meet all necessary criteria. These issues were discovered during on-the-ground field review work by the Team and then a decision was made to include or drop the site. A total of 42 sites met all relevant criteria and were reviewed during the 2014 BMP cycle (see Table 1 for historical site information).

In general, it still is difficult to obtain the desired number of NIPF field review sites. Fewer NIPF sites are meeting the minimum and/or higher priority criteria (see Site Selection discussion below for criteria details). There is a continuing reduction in the number of NIPF landowners constructing roads and installing stream-crossing culverts. This trend can impact the number of NIPF sites that meet the minimum criteria.

The 42 sites are a representative sample of logging operations conducted in Montana since 2012 **that meet specific selection criteria** (see Site Selection, below). The selection criteria restrict the sample to those sites where on-the-ground timber harvest and timber management-related activities have the potential to impact water quality.

Table 1
Historical Number of Sites Reviewed by Ownership Group

Ownership Group	2014	2012	2010	2008	2006	2004	2002	2000	1998	1996	1994	1992	1990
State	8	6	6	6	5	4	5	5	5	5	5	5	5
Federal	10	13	16	8	5	9	5	9	12	12	14	16	16
Industrial	11	12	15	17	22	19	21	18	18	14	14	16	16
NIPF	13	11	8	11	12	7	12	10	12	13	13	9	7
Total	42	42	45	42	44	39	43	42	47	44	46	46	44

See Appendix B for the list of reviewed sites.

Site Selection

In January of 2014 the DNRC-FAB sent Industry, Federal and DNRC ownership group representatives a letter requesting potential BMP field review candidate sites. Each letter included a BMP Field Review Site Information Form (see Appendix D) to be completed for each harvest operation that met the first tier or minimum selection criteria (see page 7). As with past information requests, these ownership groups were very cooperative and provided essential and complete information to DNRC. To obtain potential field review site information for NIPF ownership, DNRC searched its Hazard Reduction Agreements database and sent out letters to NIPF landowners of qualified sites asking if they would participate in the field review process. A postcard was included in the mailing for returning a response or responses could be emailed or phoned in.

The following two pages outline the new selection criteria as it was used to determine eligibility. These criteria conform to a legislative audit of the procedure that was completed in 2008.

The sample size and sites selected DO NOT represent a sample of all timber harvest operations in Montana - ONLY those meeting site selection criteria. The selected sites are those where timber harvest is located in proximity to streams and therefore has the greatest potential for non-point source pollution to occur.

Minimum Criteria

- Sites harvested (and completed) within two years prior to the field review (2012 and 2013).
- Minimum harvest size is 5 acres.
- Minimum size and volume per acre:
 - west-side sites – 3,000 or more board feet per acre removed
 - east-side sites – 1,500 or more board feet per acre removed

A portion of the sale must be located within 200 feet of a stream **or** have at least one Class I or II stream crossing on the road system associated with the harvest (access route and/or haul route) located on the ownership group's property within the field review project area **or** stream crossings are located on road for which the ownership group being reviewed had some maintenance responsibility that was associated with the harvest/sale that is being reviewed.

This is essentially privately owned roads (could have public on them though such as USFS roads) accessing the sale or harvest area that is being reviewed, no county or state roads.

Prioritization Criteria – each site submitted would be given points based on the following matrix and the points for each site totaled.

Explanation: Relative Risk Rating – this was developed as a more equitable and trackable approach to identifying higher risk sites. Each site's criteria would be assigned a point value – the more total points the higher the risk.

- | | |
|---|----------|
| • Multiple new or replacement class 1 or 2 stream crossings | 5 points |
| • Single new or replaced Class 1 or 2 stream crossing | 4 points |
| • New road construction | 3 points |
| • Reconstruction | 2 points |
| • SMZ Harvest | 2 points |
| • Existing stream crossings | 1 point |

- a. For the purposes of assigning risk - all stream crossings are class I & II only. Class 3 streams are not considered for risk factors but would be taken into account on the ground.
- b. The only stream crossings considered in determining risk are the stream crossings on the landowner's property.

Note: new or replaced stream crossings must have been implemented in association with the harvest project within 5 years of the review year.

Streams

Stream and Streamside Management Zone (SMZ): Definitions are from the Montana SMZ Administrative Rules; 36.11.301 2006 version).

For the purpose of BMP field reviews an SMZ must have an associated stream as defined in the SMZ law.

Definition of a Stream - A feature with a defined channel, definite banks or a sandy or rocky bottom, and flows water either intermittently or continuously.

Class 1 Stream – Any stream with fish. OR Any stream that flows for more than 6 months per year and flows into another stream, lake or other body of water.

Class 3 Stream – Does not have fish. Flows less than 6 months per year and does not flow into another stream, lake or other body of water.

Class 2 Stream - All streams that do not meet the definitions for Class 1 or Class 3 streams.

Roads

New Construction – Any roads constructed after January 1, 2009 used to access associated harvest areas.

Reconstruction – Reconstructing an existing road to a different set of design standards, such as widening roads, altering cut or fill slopes, culvert installation and/or replacement. For the purpose of field reviews, road work consisting of the installation of road drainage features and/or general road maintenance with no other reconstruction activities should not be submitted as “reconstruction”.

An associated site selection issue is that of access to potential field review sites. BMP field reviews are voluntary, and thus permission to access a site must be granted by the landowner entity or, in the case of NIPF lands, the individual landowner. The State, Federal and Industry ownership groups have all agreed to unrestricted access to BMP field review sites, and access is not an issue. In the case of non-industrial private land, DNRC must obtain permission from each individual landowner prior to conducting the field review on their property. In order to accomplish this, DNRC made contact by initial mailing containing a letter, a brochure explaining the process and a pre-paid post card to return to DNRC notifying us if they agree to participate or decline. After selection a follow-up notification and/or telephone call to confirm permission and grant access to perform the field review on their property was made. If permission and access was confirmed, a follow-up call was made by the team leader to finalize the field review date. Landowner(s), and the logger who did the work, were encouraged to attend.

High Risk Sites

The goal of the field review process is to have approximately 2/3 of the reviewed sites classify as high risk. In 2014 only 43% of the sites reviewed met the high risk rating. There are several reasons for the lower percentage than the goal. The factors involved include: 1) Substantially fewer timber sales met the initial qualifying criteria; 2) Few private ownerships built roads and fewer yet spent the funds to install large pipes/bridges on their lands. In fact, large installations/investments of any type were often deliberately avoided; 3) The MT DNRC under their Habitat Conservation Plan and the Forest Service under various plans do very little harvest within the SMZ. Also, Sales were still being designed to minimize expenses and generally when this is done a sale will rarely meet high risk criteria.

Table 2
Percentage of Sites with High Risk Criteria

Ownership Group	Number of Sites	Number of High Risk Sites	Percentage of High Risk Sites	Number of Sites With SMZ Harvest	Percentage of Sites With SMZ Harvest
State	8	3	37.5%	6	75%
Federal	10	4	40%	7	70%
Industry	11	7	64%	8	73%
NIPF	13	4	31%	9	69%
All Sites	42	18	43%	30	71%

The Field Review Teams (FRT)

Three FRT's were formed to conduct the 2014 field reviews--one for the northwestern, one for the western, and one for the central/eastern part of the state. These teams were typically composed of seven members--a fisheries biologist, a forester, a hydrologist, a conservation group representative, a road engineer, a soil scientist, and a shared position of logging professional or NIPF landowners. A member of each field review team was assigned to lead the team. The team leader was responsible for providing general in-the-field leadership and direction, contacting landowners, filling out the official rating form and coordinating the logistics of the team. Team members were employees of federal and state agencies, private industry, conservation organizations, independent consultants, and volunteers.

One training session was conducted prior to the actual field reviews. This session served as a refresher for those with previous experience and as a calibration for new and old team members. All team members, including alternates, were strongly encouraged to attend. The goal was to have the field review teams establish a consistent method of rating BMPs that would carry through the field review process. Team members and alternates met for 3-4 hours of classroom instruction on the BMP field review process and then evaluated a sample field review site in the field looking at specific flagged stations with specific issues. Team members shared their results and identified and discussed differences and ways to improve overall consistency. See Appendix D for a complete list of team members.

The Rating Form

The 2014 FRT's used a rating form identical to that of previous review cycles. They evaluated a maximum of 49 BMP practices and 11 SMZ practices at each site. As in the past, the rating of application and effectiveness for each practice was done on a five-point scale. See Appendix E for a copy of the rating form.

Application: The field review team rated the application of BMPs by first noting if the BMP was applicable to the site and, if so, whether it was applied to the correct technical standard, at the correct frequency, and in the proper locations. The field review teams utilize a decision tree (See Appendix G) to help rate application and effectiveness and maintain consistency.

The lack of adequate or proper application is a BMP departure. The rating guide for BMP application is:

- 5 - Operation exceeds requirements of BMP.
- 4 - Operation meets requirements of BMP.
- 3 - Minor departure from intent of BMP.
- 2 - Major departure from intent of BMP.
- 1 - Gross neglect of BMP.

The following description of the rating guide is adapted from Ehinger & Potts, 1990. The 4 rating is self-explanatory. The 3 rating, minor departure, applies to departures of small magnitude distributed over a localized area, or over a larger area where potential for impact is low. The 2 rating, major departure, applies to departures of large magnitude or to BMPs being repeatedly neglected. The 1 rating, gross neglect, applies where risks to soil and water resources were obvious, yet there was no evidence indicating that operators had applied BMPs to protect these resources.

A “5” for Application is defined by Potts and Ehinger as “Improved protection of soil and water resources over pre-project conditions.” Thus, if a BMP is applied adequately and its application leads to improved protection over pre-project conditions, the application rating for that practice would be a “5.” In actuality the Montana field review rating policy does not exactly follow the Potts and Ehinger definition. It was decided that if a BMP practice was applied in such a way that the requirements of the BMP were met, regardless of improvement over pre-existing conditions, this would provide adequate protection and thus receive an application rating of “4.” A “5” rating is basically going “above & beyond” in the application of the BMP.

Effectiveness: The effectiveness rating addresses how well the application of the applied BMP performed at limiting resource impacts and keeping soil out of water. This rating answers questions concerning impacts; for example, "Has the application or misapplication of a particular forest practice increased the likelihood of, or actual occurrence of, sediment delivery to streams?" The lack of “effectiveness” results in impacts.

The rating guide for effectiveness was:

- 5 - Improved protection of soil and water resources over pre-project condition.
- 4 - Adequate protection of soil and water resources.
- 3 - Minor and temporary impacts on soil and water resources.
- 2 - Major and temporary, or minor and prolonged, impacts on soil and water resources.
- 1 - Major and prolonged impacts on soil and water resources.

The BMP Working Group defined these terms prior to the 1990 field reviews to help the field teams use them consistently:

- Adequate**--Small amounts of material eroded; material does not reach draws, channels, or floodplain.
- Minor**--Some material erodes and is delivered to draws, but not to stream.
- Major**--Material erodes and is delivered to stream or annual floodplain.
- Temporary**--Impacts lasting one year or less; no more than one runoff season.
- Prolonged**--Impacts lasting more than one year.

Effectiveness ratings of “5” follow the same methodology as for Application. The effectiveness of the applied BMP exceeds what would be necessary to adequately protect soil and water resources. Effectiveness ratings of “5” are in fact only given if the protection provided is extraordinary or more than adequate; for example, installing a bridge for fish passage when a CMP would have met the BMP requirement or obliterating an unnecessary road rather than merely putting in road drainage or gate.

Occasionally a BMP did not apply on a site. In some cases the particular activity did not occur or was not complete, in others, the field review team could not rate the BMP at the time of the review - BMPs having to do with timing of operations during the harvest cannot be judged post-harvest. When these situations occurred, the FRT noted on the form that the practice did not apply and no rating was given. In 2014, a maximum of 2,058 practices (42 sites, 49 BMPs) could have been rated. Sixty-two percent of all possible BMP’s were rated (1,267 of 2,058). Fifty-seven percent of all possible SMZ practices were rated (264 of 462).

In addition to the 49 BMPs evaluated, the field review form contains two general questions in Section VII (Appendix E) addressed by the FRT. One question addresses the issue of overall reductions in sediment delivery to streams as a result of road improvements to existing road systems. The second addresses the third-party road system. These are discussed later in this report. These questions were answered for all sites.

Field Review Site Inspections

The teams conducted the field reviews from late June through late August of 2014. The field routine consists of team members, landowner representatives and observers meeting at a central location prior to each review. Teams and observers then travel to the field review site. When in the general area of the site, but before actually entering the road system to access the harvest area or the harvest area itself, there is a stop to discuss the specifics of the field review process. The team leader provides maps and field review forms. Usually the landowner/logger, or their representative, briefs the team by giving background information on the silvicultural prescription, time of operation, and associated practices. All decisions regarding which roads, SMZs, new culvert installations and harvest units to be reviewed are determined before the team enters the subject road system or harvest area. Once on site, all team members walk the site as a group, and review BMP practices conducted in the selected areas. Teams typically spend about two hours inspecting, discussing, and then rating each site. Observers attending the field review may give feedback when requested, but are not allowed to participate in the ratings determination process or to lobby for a particular rating.

Limitations of the Field Review Methods

In analyzing field review results, readers need to consider the limitations of the techniques used in the field review. The review technique consists of a one-time field inspection and assessment. This approach documents erosion and sedimentation problems occurring in the first two years after harvest. This is generally the critical period for erosion associated with timber harvests. Some practices conducted during harvest cannot easily be evaluated during a post-harvest field review and are not considered during the field review. The assessment is based on visual appraisals of practices and impacts to surface soils and streams. The results are a “snapshot in time” of the practices and subsequent impacts. They do not necessarily reflect future impacts. During the 1998 field reviews, sites previously reviewed in 1996 and 1994—i.e., four- to six-year-old sites—were examined for long-term impacts. This information can be found in the 1998 Forestry BMP Audit Report (Fortunate et. al.)

Sites are split among the three teams. Although rating inconsistency between teams should not be overlooked, its effect is likely minor due to the interaction between teams and the continuity of experienced team members. DNRC monitors each team to evaluate and promote consistency.

RESULTS

This section presents the results of the 2014 BMP field reviews. Results will be presented in four parts: BMP Application, BMP Effectiveness, High Risk BMPs, and SMZ Results.

Results are also in three formats: summary data for BMP practices (Tables 3 and 6), summary data for reviewed sites (Tables 4 and 7), and a listing of the specific BMPs that had departures and/or impacts (Tables 5 and 8).

Application of BMPs

The application rating measures whether the BMP was applied and whether it was applied to the correct standards the appropriate number of times and in the proper locations. See also "The Rating Form" section on page 9. Field review teams rated a total of 1,267 practices to assess how landowners and operators applied BMPs. Tables 3, 4 and 5 present results relevant to BMP Application.

Table 3
Application of BMPs to All Rated Practices
by Ownership Group and Rating Category

Ownership Group	# Practices Rated	Percentage (%) of Practices Rated As			
		Meet or Exceed	Minor Departures	Major Departures	Gross Neglect
State	270	98.2%	1.8%	0%	0%
Federal	360	94.5%	3.6%	1.9%	0%
Industrial	337	97.9%	2.1%	0%	0%
NIPF	300	98.3%	1.7%	0%	0%
All Sites	1267	97.1%	2.4%	0.5%	0%

Practices were applied correctly 97.1% of the time (Table 3). In terms of departures, of the 1,267 practices evaluated, about 2.9 % (37 of 1,267) of the practices had departures; 30 ratings of 3 (**minor departures**) and 7 ratings of 2 (**major departures**). There were no ratings of 1 (**gross neglect**).

Table 4 details the **percentage of sites with application departures** and average number of departures per site. It shows that 45% (19 of 42) of sites reviewed had **minor departures** which results in an overall average of 0.71 departures per site of the practices rated. Seven percent of all sites (3 of 42) had **major departures** which returned an overall average of 0.17 departures per site of the practices rated. Fifty-five percent of sites had **no departures**.

Table 4
Field Review Sites with Departures from BMP Application
with the Average Number of Departures per Site

		Percentage of Sites w/out Departures	Percentage (%) of Sites with Departures			Average Number of Departures Per Site*		
Ownership Group	Total # of Sites	Adequate or Improved Protection	Minor	Major	Gross	Minor	Major	Gross
State	8	62.5%	37.5%	0%	0%	0.625	0.00	0.00
Federal	10	30%	70%	20	0	1.3	0.7	0.00
Industrial	11	55%	45%	9	0	0.64	0.00	0.00
NIPF	13	69%	31%	0	0	0.38	0.00	0.00
All Sites	42	55%	45%	7	0	0.71	0.17	0.00

* Number of Departures/Total Number of Sites. In Table 4, each category of departures must be considered separately, since a site may have departures in more than one category.

Table 5 identifies the specific BMPs where departures occurred.

Table 5
Individual BMP Practices* Where Application Departures Occurred
with number of Departure Ratings Given

SECTION	BMP SUBSECTION	BMP	2 Rating Major Departures	3 Rating Minor Departures	Total Departures
III	C	1	1	6	7
III	C	2	1	2	3
III	C	3	0	3	3
III	C	4	0	1	1
III	C	5	1	0	1
III	C	7	1	3	4
III	D	2	0	2	2
III	D	3	1	0	1
III	D	5	1	0	1
III	E	2	0	4	4
IV	B	2	0	1	1
IV	B	5	0	3	3
V	B	1b	1	0	1
V	C	2	0	1	1
V	C	4	0	1	1
V	D	1	0	3	3
VII		1	0	1	1
Totals			7	31	38

* See Appendix A for a description of individual BMPs.

Effectiveness of BMPs

The effectiveness rating evaluates how well BMPs protected soil and water resources. See page 12 for further explanation of the effectiveness rating. The FRT's evaluated a total of 1,267 practices for effectiveness. Table 6 provides a summary of the effectiveness of all practices reviewed by ownership group.

Adequate protection was provided 98.1% of the time. In terms of impacts (Table 6), of 1,267 practices evaluated, 24 practices had impacts; 16 with ratings of 3 (**minor temporary** impacts), 8 with ratings of 2 (**major temporary or minor prolonged** impacts), and zero with ratings of 1 (**major and prolonged** impacts).

Table 6
Effectiveness of BMPs for All Rated Practices
by Ownership Group and Rating Category

Ownership Group	Number of Practices Rated	Percentage (%) of Practices Rated As			
		Adequate Protection	Minor/Temp. Impacts	Major/Temp. Minor/ Prolonged	Major/ Prolonged
State	270	99.6%	0.4%	0%	0%
Federal	360	96.4%	1.7%	1.9%	0%
Industrial	337	98.2%	1.5%	0.3%	0%
NIPF	300	99.0%	1.0%	0%	0%
All Sites	1267	98.1%	1.2%	0.6%	0%

Table 7 lists the percentage of sites with impacts and average number of impacts per site. The table shows that 33% (14 of 42) of the sites reviewed had impacts. A total of 16 **minor/temporary** impacts were recorded which gives an overall average of 0.38 impacts per site. Seven percent (3 of 42) of all sites had a total of 8 major/temporary impacts which gives an overall average of 0.19 impacts per site.

Table 7
Field Review Sites with Impacts (BMP Effectiveness)
and the Average Number of Impacts per Site

		Percentage (%) of Sites w/out Impacts	Percentage (%) of Sites With Impacts			Average Number of Impacts per Site*		
Ownership Group	Total # of Sites	Adequate or Improved Protection	Minor/Temp.	Major/Temp. Minor/ Prolonged	Major/ Prolonged	Minor/Temp.	Major/Temp. Minor/ Prolonged	Major/ Prolonged
State	8	87.5%	12.5%	0%	0%	0.125	0.0	0.0
Federal	10	50%	50%	20%	0%	0.70	0.70	0.0
Industrial	11	55%	45%	9%	0%	0.45	0.09	0.0
NIPF	13	77%	23%	0%	0%	0.23	0.0	0.0
All Sites	42	67%	33%	33%	7%	0.38	0.19	0.0

* Number of Impacts/Total Number of Sites

Table 8 identifies the specific BMPs where impacts occurred.

Table 8
Individual BMP Practices* Where Effectiveness Impacts Occurred
With the Number of Departure Ratings Given

Section	BMP Subsection	BMP	Major & prolonged 1 Rating	Major & Temp 2 Rating	Minor 3 Rating	Total Effects Impacts
III	C	1	0	2	2	4
III	C	2	0	1	0	1
III	C	3	0	0	1	1
III	C	5	0	1	0	1
III	C	7	0	1	5	6
III	D	2	0	0	2	2
III	D	3	0	1	0	1
III	D	5	0	1	0	1
III	E	2	0	0	2	2
IV	B	2	0	0	1	1
IV	B	5	0	0	1	1
V	B	1b	0	1	0	1
V	D	1	0	0	1	1
TOTALS			0	8	15	23

*See Appendix A for a description of individual BMPs.

Table 9 provides an overall numeric summary by ownership group of all departures and impacts.

Table 9
Overall Summary of Reviewed BMP Practices

Practices Information				
Group	Reviewed Sites	Total Practices Possible *	Number Practices Not Rated **	Number Practices Rated
State	8	392	122	270
Federal	10	490	130	360
Industry	11	539	202	337
NIPF	13	637	337	300
Total	42	2,058	791	1267

Application/Departures					Effectiveness/Impacts			
Group	Exceeds Required (5)	Minor/Temp (3)	Major/Temp Minor/Prolonged (2)	Major Prolonged (1)	Exceeds (5)	Minor (3)	Major (2)	Gross Neglect (1)
State	3	6	0	0	1	1	0	0
Federal	1	14	7	0	0	6	7	0
Industry	1	7	0	0	1	5	1	0
NIPF	0	5	0	0	0	3	0	0
Totals	5	32	7	0	2	15	8	0

* Total practices possible based on the number of field review sites for each ownership.

** Practices not rated because the practice did not apply to the site. For example there was no new culvert installation

High Risk BMPs

Percentages alone will not give a clear picture of the application and effectiveness of Montana's forestry BMPs. Even a low percentage of misapplied BMPs can still result in major impacts. Additionally, all practices evaluated can affect water quality, but the magnitude of their potential impacts can vary greatly. For example, drainage from a skid trail half a mile from a stream may not have as direct an impact on water quality as providing adequate road surface drainage at a stream crossing. In an effort to gain insight regarding the practices with the higher potential to directly impact water quality, eight high risk BMPs have been identified and analyzed separately. They are among the most important for protecting Montana's watersheds. They include:

**BMP
Number**

Practice Description

III.C.1	Provide adequate road surface drainage for all roads.
III.C.7	Route road drainage through adequate filtration zones before entering a stream.
III.D.2	Stabilize erodible soils (i.e., seeding, benching, mulching).
III.E.2	Maintain erosion control features (dips, ditches and culverts functional).
IV.A.5	Design and locate skid trails to avoid concentrating runoff.
IV.B.5	Adequate drainage for temporary roads, skid trails, fire lines.
IV.C.8	Limit water quality impacts of prescribed fire.
V.C.4	Prevent erosion of culvert and bridge fills (i.e., armor inlet and outlet).

The results for application and effectiveness of the eight high risk BMPs are presented in Tables 10 and 11. Table 12 shows a comparison between All BMPs and High Risk BMPs.

Table 10 shows the BMP application for the eight high risk BMPs. The percentage of practices with departures is higher for the high risk group (7% vs. 2%) than for all reviewed practices, as shown in Table 12

* Note: Tables 10 through 12 were rounded to the nearest percentage point for readability

Table 10
Application of High Risk BMPs
by Ownership Group and Rating Category

Ownership Group	Number of Practices Rated	Percent (%) Practices Rated As			
		Adequate Application	Minor Departures	Major Departures	Gross Neglect
State	54	94%	6%	0%	0%
Federal	69	84%	13%	3%	0%
Industrial	74	92%	8%	0%	0%
NIPF	68	99%	1%	0%	0%
All Practices	265	92%	7%	1%	0%

Table 11 shows the effectiveness of the eight high risk BMPs. The percentage of practices with departures is higher for the high risk group (7% vs. 2%) than for all reviewed practices, as shown in Table 12.

Table 11
Effectiveness of High Risk BMPs
by Ownership Group and Rating Category

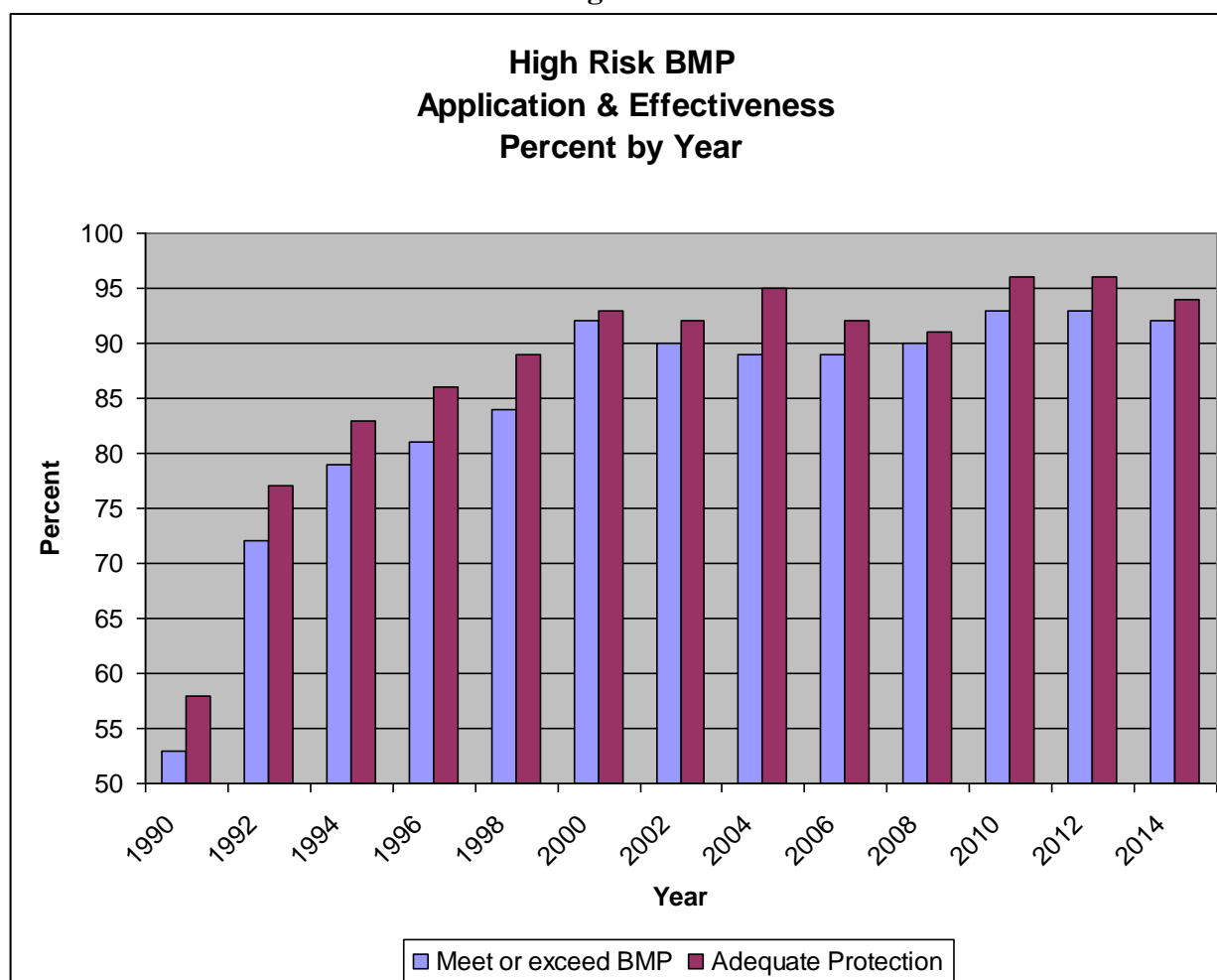
Ownership Group	Number of Practices Rated	Adequate Protection	Minor/Temp. Impacts	Major/Temp. Minor/Prolonged	Major/Prolonged
State	54	98%	2%	0%	0%
Federal	69	90%	7%	3%	0%
Industrial	74	92%	7%	1%	0%
NIPF	68	99%	1%	0%	0%
All Practices	265	94%	5%	1%	0%

Table 12
BMP Application and Effectiveness - All vs. High Risk

Application				
BMPs	Meet or Exceed	Minor Departure	Major Departure	Gross Neglect
All	97%	2+%	<1%	0%
High Risk	92%	7%	1%	0%
Effectiveness				
BMPs	Meet or Exceed	Minor Departure	Major Departure	Gross Neglect
All	98%	1+%	<1%	0%
High Risk	94%	5%	1%	0%

Figure 1 below gives a graphical representation of this discussion.

Figure 1:



Streamside Management Zones

There is a different purpose in reviewing SMZ rules compared to BMP practices. They are both designed to protect water quality. The SMZ Law and Rules are a regulated activity, however, conducting these field reviews is a non-regulatory look at SMZ rules compliance, whereas BMPs are non-regulatory by design.

As in past years, the BMPs listed were taken from the formal SMZ Rules adopted in 1993 and modified in 2006. The scoring was the same as the BMP five-part rating scale. **As with the BMPs in general, these ratings did not constitute an investigation or a DNRC enforcement action, nor were they used as a basis for future enforcement actions.** The FRT evaluated departures based on their best professional judgment.

The SMZ law and rules were applicable to 30 of the 42 field review sites. Harvest of trees or potential impacts from harvesting within or near riparian areas occurred on 13 of the 30 sites (Table 2). A total of 6 SMZ departures were noted on 3 of the sites. A total of 264 SMZ evaluations were made. SMZ rules were applied correctly 98% of the time. Of the 6 application departures, 3 had minor impacts. There were no major impacts to the SMZ's (Table 15).

In the 2010 field review cycle a decision was made not to rate SMZ Practice 1b, “SMZ [boundary] properly marked. The general consensus from the teams was that this is a very difficult practice to do accurately evaluate because ribbon lines markings are often torn down after a project is completed. They are torn down by cows, deer, or elk which seem to enjoy chewing on the ribbon and often can get disturbed during the harvest or post harvest. Also, some ribbon biodegrades before a field review may take place. Therefore, it was decided and approved by the BMP Working Group to drop this rating from the field review process.

SMZ effectiveness was very high, over 99% for all ownerships combined. Of the 264 SMZ evaluations, 261 provided adequate protection (4 rating); 3 impacts were Minor/Temporary (3 rating) and there were no impacts rated as Major/Temporary or Minor/Prolonged (2 rating). There were no ratings of Major and Prolonged impacts (1 rating).

Table 13
SMZ Departures by Ownership Group

Ownership Group	Number of sites evaluated					Number of Sites with Departures					Total Number of Departures				
	'14	'12	'10	'08	'06	'14	'12	'10	'08	'06	'14	'12	'10	'08	'06
State	6	6	6	6	5	1	0	0	0	0	2	0	0	0	0
Federal	7	10	14	7	4	0	2	3	1	0	0	3	7	1	0
Industrial	8	12	12	17	20	0	2	1	3	4	0	2	2	10	7
NIPF	9	9	5	11	12	2	3	1	5	2	4	6	1	13	3
All Sites	30	37	37	41	41	3	7	5	9	6	6	11	10	24	10

Table 14 provides a summary and comparison of SMZ departures by practice.

Table 14
SMZ Application Departures by Practice

Practice	Number of Departures
Equipment Operation in SMZ	2
SMZ Width Maintained	1
Pre-approved Alternative Practice	1
SMZ Tree Retention	2
TOTAL	6

Table 15 provides a summary of application departures and effects.

Table 15
Summary of SMZ Departures and Effects

Application			Effectiveness		
Number of Departures	Minor Departures (3)	Major Departures (2)	Number of Impacts	Minor/Temp. (3)	Major/Temp Minor/Prolonged (2)
6	3	3	3	3	0

SMZ Width

In all but one case, the SMZ width exceeded or met the requirements of the SMZ law. Departures did occur on the one site where the width was not adequately maintained, but the impacts were minimal; minor & temporary. The other departures occurred as a result of a misinterpretation of a pre-approved alternative practice and an equipment violation. All were minor with little or no impacts.

DISCUSSION

Application Across All Ownerships

Ninety-seven percent (97%) of the BMP practices rated were properly applied according to BMP standards (Table 3). This percentage represents a slight decrease from the 2012 overall rating of 98%, but continues to maintain an extremely high level of compliance. Slight variations in these statistics are to be expected given the variation in the number of sites evaluated each year and the variation in the practices employed. However this high percentage demonstrates the strong commitment all ownership groups and the logging community in general, have for properly applying Montana's BMPs and practicing sound forest management particularly along rivers, streams and wetlands.

Effectiveness Across All Ownerships

Ninety-eight percent (98%) of all applied BMPs were shown to be effective in preventing sediments from reaching draws or streams. The lowest percentage was 96% on Federal lands with most issues attributable to "legacy roads". The State, Industry, and NIPF all exceeded 98%.

The most frequent departures and impacts, once again, were associated with road maintenance and road surface drainage. The following list ranks rated BMPs by the sum of departures and impacts. Practice III.C.1 is ranked #1 because it had more total departures and impacts than any other practice. Ties indicate BMPs with equal number of departures/impacts. See Appendix J for a listing of all BMPs where departures and impacts were recorded and the number of departures and impacts identified.

Table 16
BMPs Ranked by the Total Sum of Departures plus Impacts for Each Field Review Cycle

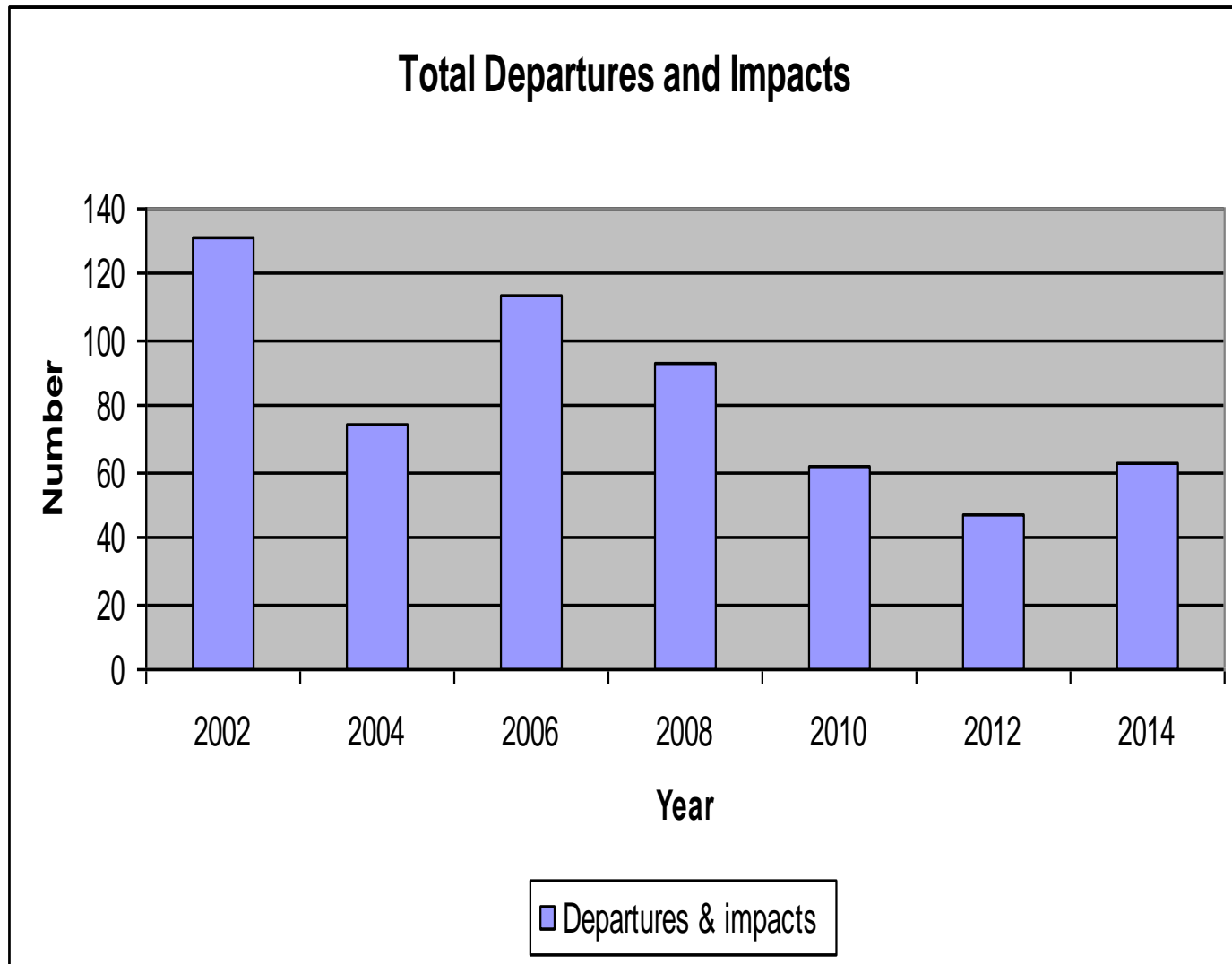
Practice #	BMP Description	2014	2012	2010	2008	2006	2004	2002	2000	1998	1996	1994	1992	1990
III.C.1 *	Provide adequate road surface drainage for all roads	1	2	1	1	1	2	1	1	1	1	1	3	1
V.D.1	Culverts maintained to preserve hydrologic capacity	4	3	3	3	2	13	--	--	--	--	--	--	--
III.E.2 *	Maintain erosion control features (dips, ditches and culverts functional).	3	1	3	2	3	1	3	6	3	5	5	--	10
III.C.7 *	Route road drainage through adequate filtration zones before entering a stream	2	5	2	3	4	3	2	3	2	7	2	2	--
V.B.1b	Direct road drainage away from stream crossing site.	5		5	--	5	5	2	2	5	3	3	13	19
III.E.1	Grade roads as necessary to maintain drainage		4	--	--	6	16	--	--	--	--	--	--	--
IV.B.5*	Adequate drainage for skid trails	4	6	6	5	6	4	--	--	--	--	--	--	--
V.C.2	Stream crossing culverts conform to natural streambed and slope	6	5	--	--	6	--	--	--	--	--	--	--	--
IV.A.6.	Suitable location, size, and number of landings.			5	4	7	--	--	--	--	--	--	--	--
IV.A.5*	Design and locate skid trails to avoid concentrating runoff.			4	--	8	5	--	--	--	--	--	--	--
III.E.3	Avoid cutting the toe of cut slopes.			3	--	9	--	--	--	--	--	--	--	--
IV.B.4	Adequate drainage for landing.			5	4	--	--	--	--	--	--	--	--	--
III.C.3	Design of relief culverts.	4	5	6	6	--	--	--	--	--	--	--	--	--
III.D.2*	Stabilize Erodible Soils	4			6	--	--	--	--	--	--	--	--	--
V.C.4*	Prevent erosion from stream crossing culverts and bridges	6		3	--	--	--	--	--	--	--	--	--	--
III.D.5	Cut and fill slopes at stable angles	5	6	3	--	--	--	--	--	--	--	--	--	--
III.D.8	Waste material not entering stream			4	--	--	--	--	--	--	--	--	--	--
III.C.4	Install culverts at original gradient	6		6	--	--	--	--	--	--	--	--	--	--
III.C.5	Provide energy dissipaters at drainage structure outlets where needed	5		5	--	--	--	--	--	--	--	--	--	--
III.D.6	No woody debris in road fill			5	--	--	--	--	--	--	--	--	--	--
IV.B.2	Avoid operating equipment in isolated wetlands	5	6	6	--	--	--	--	--	--	--	--	--	--
III.C.2	Ephemeral draws – proper culvert design	4	6											
III.E.6	Avoid use of roads during wet periods and breakup		6											
IV.C.8	Limit water quality impact of prescribed fire		6											
III.D.3*	Provide sediment control on erodible fill slopes (ex Slash filter windrows)	5												
VII. .1*	Know & comply with regulations governing hazardous substances.	6												
	Fish Passage	1												

* Indicates “High Risk” BMPs.

It is interesting to note that the top three ranked BMPs on the above list account for 44% of all departures and impacts. It can also be seen from this listing that the noted impacts generally occur within the same BMPs cycle after cycle.

A graphical comparison, Figure 2, illustrates the following: in 2002, there were 133 total departures and impacts; in 2004 there were 74; in 2006 it was 114, in 2008 we had 93, in 2010 there were 62, in 2012 there were 47 and in 2014 there were 63. This is considered to be consistent and ongoing improvement.

Figure 2:



Combining application and effectiveness, the 2014 field reviews rated a total of 2,534 (1,267 x 2) BMP practices for the 42 sites. There were a combined total of 63 ratings with a departure or impact. **A departure or an impact occurred on 2.5% of all practices rated.**

Comparisons with Previous Field Reviews

See Tables 17 and 18 for a comparison of overall field review results.

The 2014 reviews show a continuing improvement in results when compared to earlier years; See Figure 3. There were slight decreases in some categories, however the changes were small and could reflect statistical variation. Figures 4 & 5 depict a graphical representation of the continued progress in reducing the number of departures and impacts in Montana's timber harvesting operations.

Figure 3:

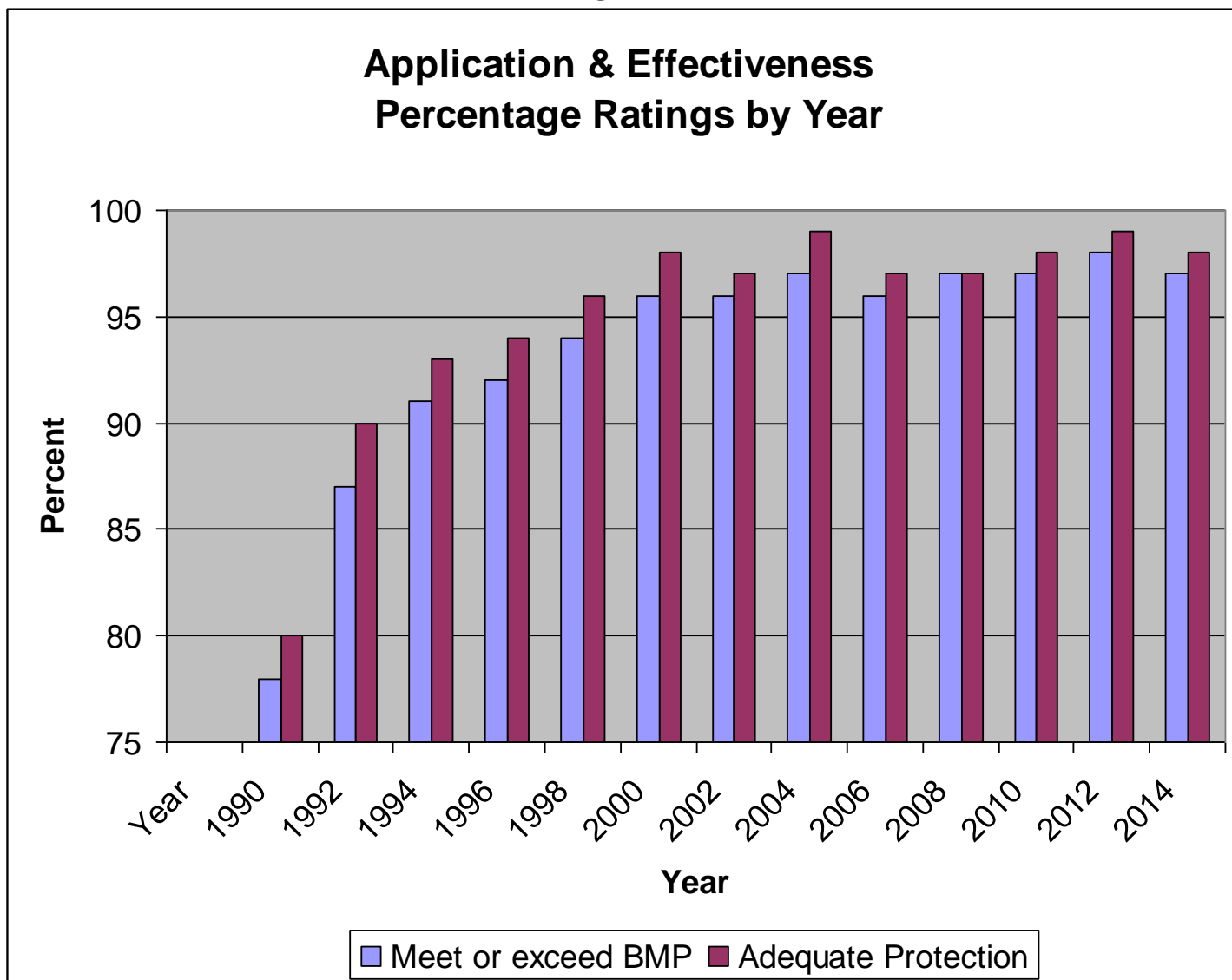


Figure 4;

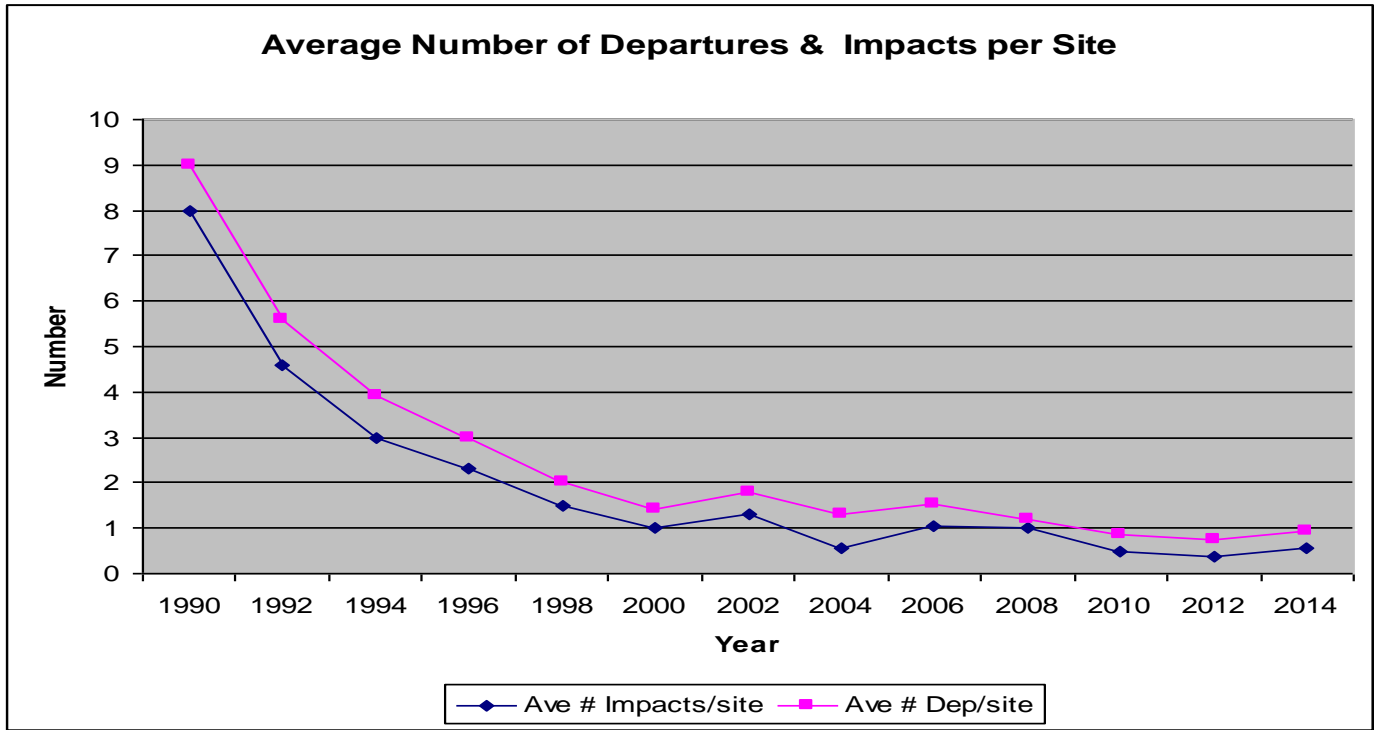


Figure 5

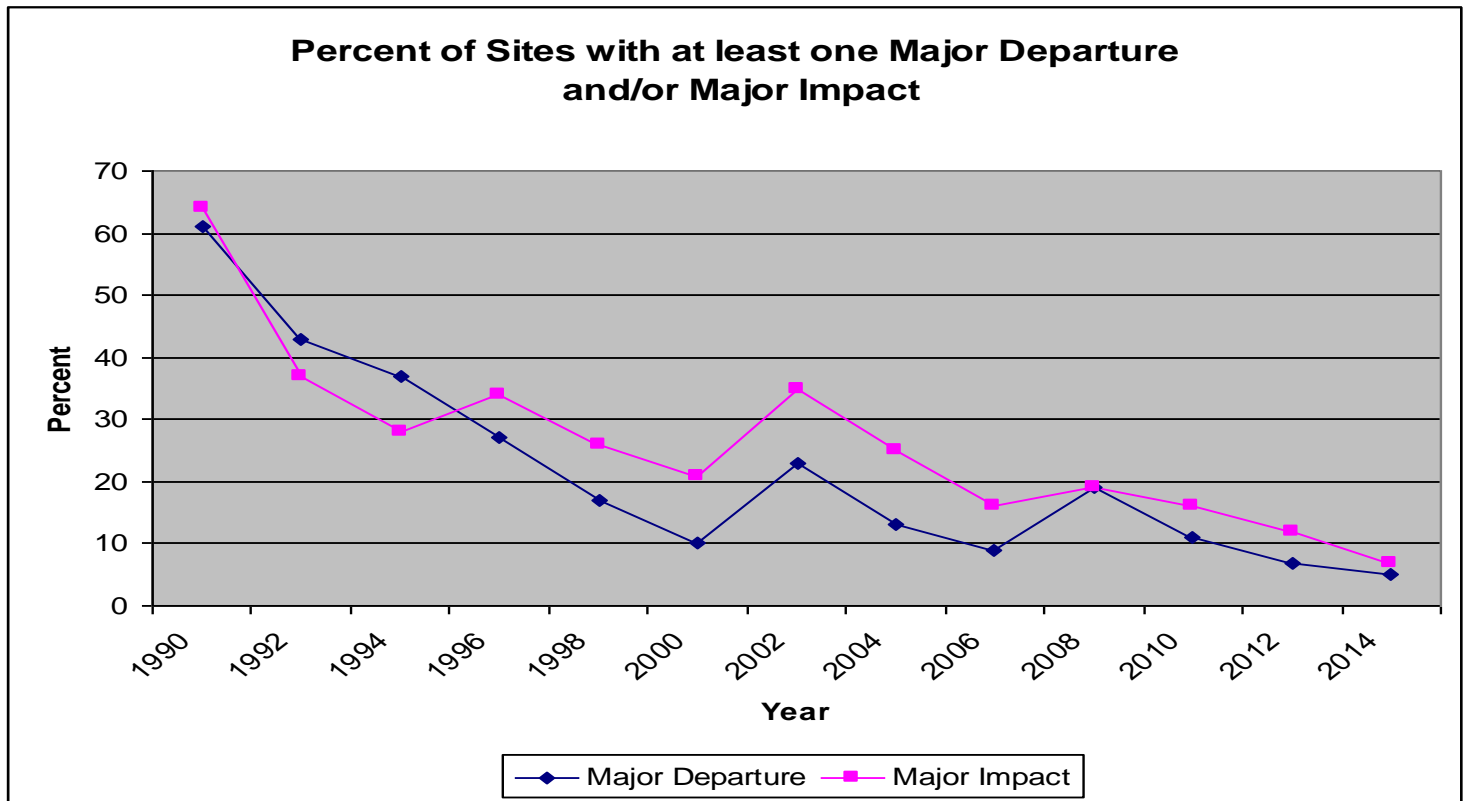


Table 17
Comparison of 2014 BMP Field Review Findings with All Previous Results

Category	2014	2012	2010	2008	2006	2004	2002	2000	1998	1996	1994	1992	1990
Application of all practices that meet or exceed BMP requirements.	97%	98%	97%	97%	96%	97%	96%	96%	94%	92%	91%	87%	78%
Application of high risk practices that meet or exceed BMP requirements.	92%	93%	93%	90%	89%	89%	90%	92%	84%	81%	79%	72%	53%
Number of sites with at least one major departure in BMP application.	2 of 42 (5%)	3 of 42 (7%)	5 of 45 (11%)	8 of 42 (19%)	4 of 44 (9%)	5 of 39 (13%)	10 of 43 (23%)	4 of 42 (10%)	8 of 47 (17%)	12 of 44 (27%)	17 of 46 (37%)	20 of 46 (43%)	27 of 44 (61%)
Average number of all departures in BMP application, per site.	0.93	0.76	0.87	1.19	1.52	1.30	1.80	1.40	2.00	3.00	3.90	5.60	9.00
Percentage of all practices providing adequate protection.	98%	99%	98%	97%	97%	99%	97%	98%	96%	94%	93%	90%	80%
Percentage of high risk practices providing adequate protection.	94%	96%	96%	91%	92%	95%	92%	93%	89%	86%	83%	77%	58%
Number of sites having at least one major / temporary or minor / prolonged impact.	3 of 42 (7%)	5 of 42 (12%)	7 of 45 (16%)	8 of 42 (19%)	7 of 44 (16%)	10 of 39 (25%)	15 of 43 (35%)	9 of 42 (21%)	12 of 47 (26%)	15 of 44 (34%)	13 of 46 (28%)	17 of 46 (37%)	28 of 44 (64%)
Average number of impacts per site.	0.57	0.38	0.47	1.02	1.05	0.56	1.30	1.00	1.50	2.30	3.00	4.60	8.00

Results by Ownership Group

2014 field review results across all ownership groups were 97.7% or above for all BMP and SMZ categories (Table 19). Across all ownerships 3,062 ratings were made (2,534 BMP and 528 SMZ) with a total of 71 departures and impacts (62 BMP and 9 SMZ) for an overall compliance rating of 97%.

Given that all ownership groups demonstrated excellent overall compliance at the sites reviewed in 2014, there are some general observations that can be made for each. See Tables 9 and 19 and Appendix J for ownership comparison tables.

Table 18
Summarized Field Review Site Results 1990 Through 2014

		2014	2012	2010	2008	2006	2004	2002	2000	1998	1996	1994	1992	1990
Application	Meets/Exceeds	96.9%	97.6%	97%	96%	96%	97%	96%	96%	94%	92%	91%	87%	78%
	Minor Departures	2.5%	2.1%	2%	4%	4%	3%	3%	3%	5%	7%	7%	8%	14%
	Major Departures	0.6%	0.3%	<1%	<1%	<1%	<1%	1%	0.3%	1%	1%	3%	4%	8%
Effectiveness	Adequate Protection	98.2%	99.8%	98%	97%	97%	99%	97%	98%	96%	94%	93%	90%	80%
	Minor Impacts	1.2%	0.5%	<1%	2%	2%	<1%	1%	2%	3%	4%	5%	6%	11%
	Major Impacts	0.6%	0.7%	2%	<1%	<1%	<1	2%	.07%	1%	2%	2%	4%	8%
% Sites	With Major Departures	7%	7%	11%	19%	9%	13%	23%	10%	17%	27%	37%	43%	61%
	With Major Impacts	7%	12%	16%	19%	16%	25%	35%	21%	26%	34%	28%	37%	64%
Average Departures	Minor Per Site	.76	0.67	0.76	0.90	1.32	1.1	1.4	1.3	1.7	2.5	2.7	3.7	5.5
	Major Per Site	.16	0.09	0.11	0.29	.20	0.26	0.39	0.12	0.34	0.55	1.1	1.4	2.5
Average Impacts	Minor Per Site	.36	0.14	0.18	0.74	.66	0.26	0.58	0.71	1	1.6	2.1	2.8	4.4
	Major Per Site	.16	0.24	0.29	0.29	.32	0.31	0.75	0.29	0.51	0.66	0.8	1.4	3.0

State

All State 2014 field review results were at 98.7% or above, continuing the high average scores of past results. Numbers of sites with departures were 3 out of 8 however only one site had any impacts and that was minor. SMZ results were 96.1% and 98.0% for Application and Effectiveness respectively. Slightly down from the 100% in the past two cycles. For the high risk BMPs, Application “meets or exceeds” scores (3 minor departures out of 54 rated) equaled 94% and Effectiveness “meets or exceeds” scores remained very high at 98+%.

Federal

In 2014 there were 10 federal sites, 8 were U.S. Forest Service and 2 were Bureau of Land Management. The federal scores also remained high. For the BMP application their score was 94+%. The Effectiveness score rated at 96+% for a combined score of 95+%. SMZ Application and Effectiveness improved to the maximum at 100% for both. For high risk BMPs, the Federal agencies “meets or exceeds” scores equaled 84% (58 out of 69 rated) and the Effectiveness rated 91+%. These scores continue to show improvement and are encouraging given the fact that many of the federal roads were built long before the implementation of BMP’s

Industry

Industry’s 11 sites scored 98-% for Application and 98+% for Effectiveness of BMPs. These scores compare favorably to the past. Industry showed an SMZ Application and Effectiveness score of 100%, again continuing their high scores in this review. Industry “meets or exceeds” scores for high risk BMPs was also fairly high. Application scored a 92% as did Effectiveness..

Non-Industrial Private Forest Landowners (NIPF)

The 13 NIPF sites stayed relatively consistent in 2014 for their BMP/SMZ scores compared to previous reviews. Overall scores for BMP Application remained at 98+% and BMP Effectiveness scores stayed constant at 99%. SMZ Application increased slightly to 95% and SMZ Effectiveness decreased slightly to 97+%. For high risk BMPs, NIPF sites continued their strong showing with a 98+% score for both Application and Effectiveness.

Table 19
Ownership Results Comparison 2014, 2012, and 2010

Practice	<u>State</u>			<u>Federal</u>			<u>Industry</u>			<u>NIPF</u>			<u>Totals</u>		
	2014	2012	2010	2014	2012	2010	2014	2012	2010	2014	2012	2010	2014	2012	2010
BMP APPLICATION	97.8	99%	98%	94.2%	97%	96%	97.9%	98%	98%	978.3%	96%	98%	96.9%	98%	97%
BMP EFFECTIVENESS	99.6	99%	99%	96.1%	98%	98%	98.2%	99%	99%	99.0%	99%	99%	98.1%	99%	98%
SMZ APPLICATION	96.1	100%	100%	100%	97%	94%	100%	99%	100%	94.8%	93%	98%	97.7%	97%	97%
SMZ EFFECTIVENESS	98.0	100%	100%	100%	99%	95%	100%	99%	98%	97.4%	99%	100%	98.9%	99%	98%

Third Party Road and Other Use Implications

In 2014 FRT Members still noted a range of water quality impacts not resulting directly from the sale being reviewed. Third party road impacts were observed at several field sites. Third party roads are roads not owned or directly controlled by the landowner being reviewed. Since the roads are not under the direct control of the participating landowner third party roads are not rated in the field review process. In order to qualitatively monitor BMPs associated with third party roads there is a location in Section VII of the field review form (Appendix E) where teams can record observations regarding third party roads. Several situations were noted where impacts were occurring because either roads were not adequately maintained by the road owner or roads were being used for another purpose, and that activity not related to the sale being reviewed was causing impacts.

Reductions in Overall Sediment Delivery

The question was asked as to how this could be evaluated and the results presented in the Field Review Report. The BMP Working Group decided to add a new question to the BMP Field Review Form (Appendix E). The new question is in Section VII of the Field Review Form and reads, "Project included road improvements to existing road system that reduced overall sediment delivery to streams." The teams were asked to do a visual qualitative assessment of each reviewed project's post-project road system and, when possible, determine if improvements resulted in a reduction in sediment delivery to streams. The 2014 field review results for this question are provided in Table 20.

Table 20
Overall Sediment Reduction – Pre vs. Post Project Condition

Landowner	# Sites Reviewed	# Sites Applicable	Number Yes	Number No
STATE	8	8	3	5
FEDERAL	10	10	5	5
INDUSTRY	11	11	4	7
NIPF	13	13	2	11
TOTALS	42	42	14	28

Results indicated 33% of the applicable sites reduced sediment delivery to streams from existing roads. This was compared to pre-project conditions. In these comparisons, an existing road system was in place prior to project commencement, and some sedimentation was occurring. During the course of the project, BMPs were implemented or brought up to current BMP standards such that sediment delivery to draws or streams was reduced. A “No” response indicated that there were no opportunities to reduce sediment on existing roads. Possible causes are that there were either no pre-existing roads or that BMPs had already been applied to the existing road system and were adequately functioning.

Existing roads are defined as road systems in place prior to commencement of activities on the sale being reviewed. This question did not apply to project areas where roads were not in place prior to commencement of activities.

A “Yes” determination does not necessarily mean that there was no sediment delivery occurring post-project. A “Yes” indicates that the post-operations status regarding delivery has been improved over the original conditions. Likewise, a “No” determination does not mean that conditions have worsened, nor that no improvements were made to the existing road system. A “No” indicates that any improvements made did not lead to reductions over pre-project conditions.

OTHER BMP ISSUES OF NOTE

Field Review Site Selection Process

During the 2007 Legislative Session the EQC directed the Legislative Audit Division (LAD) to initiate a performance audit of the Department of Natural Resources and Conservation Forest Practices Program. This audit focused primarily on the BMP audit process.

The performance audit provided one recommendation as follows:

“Recommendation #1: We recommend DNRC, in conjunction with the BMP Technical Working Group; expand BMP audit selection criteria prior to the 2008 BMP audit cycle to audit/monitor a broader spectrum of timber harvest sites.”

Upon receipt of the performance audit results, DNRC responded with a request to move the implementation date to the 2010 field review cycle. This request was accepted.

The new selection criteria were implemented starting with the 2010 review cycle and have been in place since.. The criteria are shown below.

2014 Site Selection Criteria

Minimum Criteria – all commercial timber sale sites meeting these criteria must be submitted to DNRC.

- Timber Harvest must have occurred within 2 years of the field review year. The field review window can be extended to three years prior to the field review year by DNRC if necessary to yield a sufficient population for a given ownership category.
- A portion of the sale must be located within 200 feet of a stream or have at least one Class I or II stream crossing on the road system associated with the harvest located on the ownership group's property within the reviewed project area or stream crossings are located on sections of road that the reviewed party has a maintenance responsibility on the road system within the reviewed project area.
- Minimum harvest size 5 acres.
- Minimum harvest removal west side 3,000bf/acre, east side 1,500 bf/ac. The continental divide acts as the rough boundary between east and west.

Prioritization Criteria – each site submitted would be given points based on the following matrix and the points for each site totaled.

- | | |
|---|----------|
| ○ Multiple new or replacement class 1 or 2 stream crossings | 5 points |
| ○ Single new or replaced Class 1 or 2 stream crossing | 4 points |
| ○ New road construction | 3 points |
| ○ Reconstruction | 2 points |
| ○ SMZ Harvest | 2 points |
| ○ Existing stream crossings | 1 point |

Note: new or replaced stream crossings must have been implemented in association with the harvest project within 5 years of the review year.

Fish Passage BMPs

The BMP Working Group has created a matrix for measuring the effectiveness of newly installed Fish Passage culverts. The final process measures four separate parameters of the culvert installation. These are 1) The installation accommodates bankfull width (the mean high water level) of the stream; 2) The installation mimics the natural slope of the stream; 3) The installation retains substrates (gravels, cobbles, etc.) that are representative of the typical streambed for the stream in that location; and 4) the installation retains water depth through the culvert that is consistent with the surrounding stream.

These four criteria are assessed on a Less Favorable – More Favorable scale. An average 1 – 5 rating for the installation is developed based on these four ratings. This rating system was implemented on a trial basis during the 2008 and 2010 Field Review Cycles. This was to give the field review teams opportunities to familiarize themselves with the process and to evaluate whether the rating criteria were practical to implement. The feedback from the review teams is positive and these criteria will be used to measure new and replacement culvert installations that are associated with the reviewed timber sale.

This year two sites were rated as applicable and were reviewed for fish passage. .

Table 21
Fish Passage Installation Ratings

Sale Number	Ownership	Application	Effectiveness
Fed - 1	BLM	4	4
ST 9	DNRC	3	4

CONCLUSIONS

This final section addresses the data collected and analyzed. Conclusions will address the objectives of the Best Management Practices field reviews as outlined on page five.

Determine if BMPs are being applied on timber harvest operations.

When considering sites meeting site selection criteria, it can be conclusively stated that BMPs are being applied correctly at a very high rate. This has been ongoing for several review cycles. Great care is taken to conceal the identity/location of field review sites in order to prevent activity that may alter the site from what it normally would have looked like. Steps are also taken to make the selection process as random as possible. When someone does work they wouldn't ordinarily do on a field review site has not been an issue but taking precautions will continue to ensure the integrity of the process. There were no sites reviewed where evidence of BMP application was not present. Informational handouts and local expertise from DNRC service foresters, consultants, loggers, MSU Extension forestry, and mill foresters have all contributed to improving BMP application rates. It is very reasonable to conclude that voluntary Forestry BMPs continue to be the strived for standard for timber harvest operations in Montana.

Evaluate the general effectiveness of BMPs in protecting soil and water resources.

Conclusions drawn from the field review results over the past 24 years are very straightforward and consistent; when BMPs are applied correctly, they are very effective in protecting soil and water resources. This combined with the efforts of many loggers, landowners, agencies, and mills to go above and beyond the standards to minimize sediments has kept overall results high and has brought real improvements on the ground, where it counts. When teams review a site they don't just look at the actual BMP. They look at whatever the BMP was designed to protect as well. Is there silt entering the stream? Are roads rutted beyond typical usage patterns? And so forth. The idea is to look at all aspects of any particular BMP and see if it is working and if not why not. Teams note if it is a fault of the operation, outside factors, or of the BMP itself. The BMP Working Group reviews the combined results and determines if any changes to the BMPs themselves need to be made.

Provide information on the implementation of the SMZ law and rules and evaluate the general effectiveness of SMZs in protecting water quality.

The 2014 field review data once again shows that the SMZ law and rules are being effectively and consistently applied across the state. This coincides with what we see in DNRC's SMZ enforcement program. DNRC enforcement records continue to show that the SMZ law and rule violations across the state are generally few and that the impacts associated with these violations are generally minor and that they can be very effectively mitigated and/or repaired. As with previous review cycles, the 2014 field review data supports the contention that the SMZ law and rules are highly effective in protecting water quality and streamside habitat and structure during timber harvest operations.

Provide information to focus future educational or study efforts by identifying subjects and geographic areas in need of further attention or investigation.

When a BMP is consistently being missed by loggers/landowners it is noted by the Team Leaders and is shown by the data collected. This information is factored into the agenda for the annual BMP/SMZ Workshops put on for the public and specific training may be devised by the DNRC to address the issue.

Provide information on the need to revise, clarify, or strengthen BMPs.

Opportunities to strengthen the BMPs are always assessed by the teams during in-the-field reviews. If a particular BMP appears to have gaps or needs additional language to properly respond to a new harvest methodology that observation gets reported back to the Field Reviews Coordinator who investigates and prepares a write-up for the BMP Working Group to consider.

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APPENDIX A

BEST MANAGEMENT PRACTICES FOR FORESTRY IN MONTANA

January 2006

* BMPs Not Monitored During Field Reviews

DEFINITIONS

1. "Hazardous or toxic material" means substances which by their nature are dangerous to handle or dispose of, or a potential environmental contaminant, and includes petroleum products, pesticides, herbicides, chemicals, and biological wastes.
2. "Stream," as defined in 77-5-302(7), MCA, means a natural water course of perceptible extent that has a generally sandy or rocky bottom or definite banks and that confines and conducts continuously or intermittently flowing water.
3. "Streamside Management Zone (SMZ)" or "zone" as defined at 77-5-302(8), MCA means "the stream, lake, or other body of water and an adjacent area of varying width where management practices that might affect wildlife habitat or water quality, fish, or other aquatic resources need to be modified." The streamside management zone encompasses a strip at least 50 feet wide on each side of a stream, lake, or other body of water, measured from the ordinary high water mark, and extends beyond the high water mark to include wetlands and areas that provide additional protection in zones with steep slopes or erosive soils.
4. "Wetlands" mean those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include marshes, swamps, bogs, and similar areas.
5. Adjacent wetlands are wetlands within or adjoining the SMZ boundary. They are regulated under the SMZ law.
6. Isolated wetlands lie within the area of operation, outside of the SMZ boundary, and are not regulated under the SMZ law.

II. STREAMSIDE MANAGEMENT

The Streamside Management Law (77-5-301 through 307 MCA) provides minimum regulatory standards for forest practices in streamside management zones (SMZ). The "Montana Guide to the Streamside Management Zone & Rules" is an excellent information source describing management opportunities and limitations within SMZs.

III. ROADS

A. Planning and Location

1. Minimize the number of roads constructed in a watershed through comprehensive road planning, recognizing intermingled ownership and foreseeable future uses. Use existing roads, unless use of such roads would cause or aggravate an erosion problem.
2. Review available information and consult with professionals as necessary to help identify erodible soils and unstable areas, and to locate appropriate road surface materials.*
3. Fit the road to the topography by locating roads on natural benches and following natural contours. Avoid long, steep road grades and narrow canyons.
4. Locate roads on stable geology, including well-drained soils and rock formations that tend to dip into the slope. Avoid slumps and slide-prone areas characterized by steep slopes, highly weathered bedrock, clay beds, concave slopes, hummocky topography, and rock layers that dip parallel to the slope. Avoid wet areas, including moisture-laden or unstable toe slopes, seeps, wetlands, wet meadows, and natural drainage channels.
5. Minimize the number of stream crossings and choose stable stream crossing sites.
6. Locate roads to provide access to suitable (relatively flat and well-drained) log landing areas to reduce soil disturbance.*

B. Design

1. Properly design roads and drainage facilities to prevent potential water quality problems from road construction.*
2. Design roads to the minimum standard necessary to accommodate anticipated use and equipment. The need for higher engineering standards can be alleviated through proper road-use management.
3. Design roads to balance cuts and fills or use full bench construction (no fill slope) where stable fill construction is not possible.*
4. Design roads to minimize disruption of natural drainage patterns. Vary road grades to reduce concentrated flow in road drainage ditches, culverts, and on fill slopes and road surfaces.

- C. **Road Drainage.** Road Drainage is defined as all applied mechanisms for managing water in a non-stream crossing setting, road surface drainage, and overland flow; ditch relief, cross drains and drain dips)
1. Provide adequate drainage from the surface of all permanent and temporary roads. Use outsloped, insloped or crowned roads, and install proper drainage features. Space road drainage features so peak flow on road surfaces or in ditches will not exceed capacity.
 - a. Outsloped roads provide a means of dispersing water in a low-energy flow from the road surface. Outsloped roads are appropriate when fill slopes are stable, drainage will not flow directly into stream channels, and transportation safety can be met.
 - b. For in-sloped roads, plan ditch gradients steep enough, generally greater than 2% but less than 8%, to prevent sediment deposition and ditch erosion. The steeper gradients may be suitable for more stable soils; use the lower gradients for less stable soils.
 - c. Design and install road surface drainage features at adequate spacing to control erosion; steeper gradients require more frequent drainage features. Properly constructed drain dips can be an economical method of road surface drainage. Construct drain dips deep enough into the subgrade so that traffic will not obliterate them.
 2. Design all ephemeral draw culverts with adequate length to allow for road fill width. Minimum culvert size is 15 inch. Install culverts to prevent erosion of fill, seepage and failure as described in V.C.4 and maintain cover for culverts as described in V.C.6.
 3. Design all relief culverts with adequate length to allow for road fill width. Protect the inflow end of all relief culverts from plugging and armor if in erodible soil. When necessary construct catch basins with stable side slopes. Unless water flows from two directions, skew ditch relief culverts 20 to 30 degrees toward the inflow from the ditch to help maintain proper function.
 4. Where possible, install culverts at the gradient of the original ground slope; otherwise, armor outlets with rock or anchor downspouts to carry water safely across the fill slope.
 5. Provide energy dissipaters (rock piles, slash, log chunks, etc.) where necessary to reduce erosion at outlet of drainage features. Crossdrains, culverts, water bars, dips, and other drainage structures should not discharge onto erodible soils or fill slopes without outfall protection.

6. Prevent downslope movement of sediment by using sediment catch basins, drop inlets, changes in road grade, headwalls, or recessed cut slopes.*
7. Route road drainage through adequate filtration zones or other sediment-settling structures to ensure sediment doesn't reach surface water. Install road drainage features above stream crossings to route discharge into filtration zones before entering a stream.

D. Construction (see also Section IV on stream crossings.)

1. Keep slope stabilization, erosion and sediment control work current with road construction. Install drainage features as part of the construction process, ensuring that drainage structures are fully functional. Complete or stabilize road sections within same operating season.*
2. Stabilize erodible, exposed soils by seeding, compacting, riprapping, benching, mulching, or other suitable means.
3. At the toe of potentially erodible fill slopes, particularly near stream channels, pile slash in a row parallel to the road to trap sediment (example, slash filter windrow). When done concurrently with road construction, this is one method that can effectively control sediment movement, and it can also provide an economical way of disposing of roadway slash. Limit the height, width and length of "slash filter windrows" so wildlife movement is not impeded. Sediment fabric fences or other methods may be used if effective.
4. Minimize earthmoving activities when soils appear excessively wet. Do not disturb roadside vegetation more than necessary to maintain slope stability and to serve traffic needs.*
5. Construct cut and fill slopes at stable angles to prevent sloughing and other subsequent erosion.
6. Avoid incorporating potentially unstable woody debris in the fill portion of the road prism. Where possible, leave existing rooted trees or shrubs at the toe of the fill slope to stabilize the fill.
7. Consider road surfacing to minimize erosion.*
8. Place debris, overburden, and other waste materials associated with construction and maintenance activities in a location to avoid entry into streams. Include these waste areas in soil stabilization planning for the road.
9. Minimize sediment production from borrow pits and gravel sources through proper location, development and reclamation.

10. When using existing roads, reconstruct only to the extent necessary to provide adequate drainage and safety; avoid disturbing stable road surfaces. Prior to reconstruction of existing roads within the SMZ, refer to the SMZ law. Consider abandoning existing roads when their use would aggravate erosion.

E. Maintenance

1. Grade road surfaces only as often as necessary to maintain a stable running surface and adequate surface drainage.
2. Maintain erosion control features through periodic inspection and maintenance, including cleaning dips and crossdrains, repairing ditches, marking culvert inlets to aid in location, and clearing debris from culverts.
3. Avoid cutting the toe of cut slopes when grading roads, pulling ditches, or plowing snow.
4. When plowing snow, provide breaks in snow berm to allow road drainage.*
5. Haul all excess material removed by maintenance operations to safe disposal sites and stabilize these sites to prevent erosion. Avoid sidecasting in locations where erosion will carry materials into a stream.*
6. Avoid using roads during wet periods if such use would likely damage the road drainage features. Consider gates, barricades or signs to limit use of roads during spring break up or other wet periods.
7. Upon completion of seasonal operations, ensure that drainage features are fully functional. The road surface should be crowned, outsloped, insloped, or water-barred. Remove berms from the outside edge where runoff is channeled.*
8. Leave abandoned roads in a condition that provides adequate drainage without further maintenance. Close these roads to traffic; reseed and/or scarify; and, if necessary, recontour and provide water bars or drain dips.

IV. TIMBER HARVESTING, AND SITE PREPARATION

A. Harvest Design

1. Plan timber harvest in consideration of your management objectives and the following*:
 - a. Soils and erosion hazard identification.
 - b. Rainfall.
 - c. Topography.

- d. Silvicultural objectives.
 - e. Critical components (aspect, water courses, landform, etc.).
 - f. Habitat types.
 - g. Potential effects on water quality and beneficial water uses.
 - h. Watershed condition and cumulative effects of multiple timber management activities on water yield and sediment production.
 - i. Wildlife habitat.
2. Use the logging system that best fits the topography, soil type, and season, while minimizing soil disturbance and economically accomplishing silvicultural objectives.
 3. Use the economically feasible yarding system that will minimize road densities.*
 4. Design and locate skid trails and skidding operations to minimize soil disturbance. Using designated skid trails is one means of limiting site disturbance and soil compaction. Consider the potential for erosion and possible alternative yarding systems prior to planning tractor skidding on steep or unstable slopes.*
 5. Locate skid trails to avoid concentrating runoff and provide breaks in grade. Locate skid trails and landings away from natural drainage systems and divert runoff to stable areas. Limit the grade of constructed skid trails on geologically unstable, saturated, highly erosive, or easily compacted soils to a maximum of 30 percent. Use mitigating measures such as water bars and grass seeding to reduce erosion on skid trails.
 6. Minimize the size and number of landings to accommodate safe, economical operation. Avoid locating landings that require skidding across drainage bottoms.

B. Other Harvesting Activities

1. Tractor skid where compaction, displacement, and erosion will be minimized. Avoid tractor or wheeled skidding on unstable, wet, or easily compacted soils and on slopes that exceed 40 percent unless operation can be conducted without causing excessive erosion. Avoid skidding with the blade lowered. Suspend leading ends of logs during skidding whenever possible.
2. Avoid operation of wheeled or tracked equipment within isolated wetlands, except when the ground is frozen (see Section VI on winter logging).
3. Use directional felling or alternative skidding systems for harvest operations in isolated wetlands.*

4. For each landing, provide and maintain a drainage system to control the dispersal of water and to prevent sediment from entering streams.
5. Ensure adequate drainage on skid trails to prevent erosion. On gentle slopes with slight disturbance, a light ground cover of slash, mulch or seed may be sufficient. Appropriate spacing between water bars is dependent on the soil type and slope of the skid trails. Timely implementation is important.
6. When existing vegetation is inadequate to prevent accelerated erosion, apply seed or construct water bars before the next growing season on skid trails, landings and fire trails. A light ground cover of slash or mulch will retard erosion.*

C. Slash Treatment and Site Preparation

1. Rapid reforestation of harvested areas is encouraged to reestablish protective vegetation.*
2. When treating slash, care should be taken to preserve the surface soil horizon by using appropriate techniques and equipment. Avoid use of dozers with angle blades.
3. Minimize or eliminate elongated exposure of soils up and down the slope during mechanical scarification.*
4. Scarify the soil only to the extent necessary to meet the resource management objectives. Some slash and small brush should be left to slow surface runoff, return soil nutrients, and provide shade for seedlings.
5. Carry out brush piling and scarification when soils are frozen or dry enough to minimize compaction and displacement.
6. Carry out scarification on steep slopes in a manner that minimizes erosion. Broadcast burning and/or herbicide application is preferred means for site preparation, especially on slopes greater than 40%.
7. Remove all logging machinery debris to proper disposal site.*
8. Limit water quality impacts of prescribed fire by constructing water bars in firelines; not placing slash in drainage features and avoiding intense fires unless needed to meet silvicultural goals. Avoid slash piles in the SMZ when using existing roads for landings.

V. STREAM CROSSINGS

A. Legal Requirements

1. Under the Natural Streambed and Land Preservation Act of 1975 (the "310 law"), any activity that would result in physical alteration or modification of a perennial stream, its bed or immediate banks must be approved in advance by the supervisors of the local conservation district. Permanent or temporary stream crossing structures, fords, riprapping or other bank stabilization measures, and culvert installations on perennial streams are some of the forestry-related projects subject to 310 permits.

Before beginning such a project, the operator must submit a permit application to the conservation district indicating the location, description, and project plans. The evaluation generally includes on-site review, and the permitting process may take up to 60 days.

2. Stream-crossing projects initiated by federal, state or local agencies are subject to approval under the "124 permit" process (administered by the Department of Fish, Wildlife and Parks), rather than the 310 permit.
3. A short-term exemption (3a authorization) from water quality standards is necessary unless waived by the Department of Fish, Wildlife and Parks as a condition of a 310 or 124 permit. Contact the Department of Environmental Quality in Helena at 444-2406 for additional information.

B. Design Considerations (Note: 310 permit required for perennial streams)

1. Cross streams at right angles to the main channel if practical. Adjust the road grade to avoid the concentration of road drainage to stream crossings. Direct drainage flows away from the stream crossing site or into an adequate filter.
2. Avoid unimproved stream crossings. Depending on location, culverts, bridges and stable/reinforced fords may be used.

C. Installation of Stream Crossings (Note: 310 permit required for perennial streams.)

1. Minimize stream channel disturbances and related sediment problems during construction of road and installation of stream crossing structures. Do not place erodible material into stream channels. Remove stockpiled material from high water zones. Locate temporary construction bypass roads in locations where the stream course will have minimal disturbance. Time construction activities to protect fisheries and water quality.

2. Design stream-crossings for adequate passage of fish (if present) with minimum impact on water quality. When using culverts to cross small streams, install those culverts to conform to the natural stream bed and slope on all perennial streams and on intermittent streams that support fish or that provides seasonal fish passage. Ensure fish movement is not impeded. Place culverts slightly below normal stream grade to avoid outfall barriers.
3. Do not alter stream channels upstream from culverts, unless necessary to protect fill or to prevent culvert blockage. On stream crossings, design for, at a minimum, the 25-year frequency runoff. Consider oversized pipe when debris loading may pose problems. Ensure sizing provides adequate length to allow for depth of road fill.
4. Install stream-crossing culverts to prevent erosion of fill. Compact the fill material to prevent seepage and failure. Armor the inlet and/or outlet with rock or other suitable material where feasible.
5. Consider dewatering stream crossing sites during culvert installation.*
6. Maintain a 1-foot minimum cover for stream-crossing culverts 15 to 36 inches in diameter, and a cover of one-third diameter for larger culverts, to prevent crushing by traffic.
7. Use culverts with a minimum diameter of 15 inches for permanent stream crossings.*

D. Existing Stream Crossing

1. Ensure stream crossing culverts have adequate length to allow for road fill width and are maintained to preserve their hydrologic capacity. To prevent erosion of fill, provide or maintain armoring at inlet and/or outlet with rock or other suitable material where feasible. Maintain fill over culvert as described in V.C. 6.

VI. Winter Logging

A. General

1. Consider snow-road construction and winter harvesting in isolated wetlands and other areas with high water tables or soil erosion and compaction hazards.*
2. Conduct winter logging operations when the ground is frozen or snow cover is adequate (generally more than one foot) to prevent rutting or displacement of soil. Be prepared to suspend operations if conditions change rapidly, and when the erosion hazard becomes high.*

3. Consult with operators experienced in winter logging techniques.*

B. Road Construction and Harvesting Considerations

1. For road systems across areas of poor bearing capacity, consider hauling only during frozen periods. During cold weather, plow any snow cover off of the roadway to facilitate deep freezing of the road grade prior to hauling.*
2. Before logging, mark existing culvert locations. During and after logging, make sure that all culverts and ditches are open and functional.*
3. Use compacted snow for road beds in unroaded, wet or sensitive sites. Construct snow roads for single-entry harvests or for temporary roads.*
4. In wet, unfrozen soil areas, use tractors or skidders to compact the snow for skid road locations only when adequate snow depth exists. Avoid steeper areas where frozen skid trails may be subject to erosion the next spring.*
5. Return the following summer and build erosion barriers on any trails that are steep enough to erode.*

VII. HAZARDOUS SUBSTANCES

A. General

1. Know and comply with regulations governing the storage, handling, application (including licensing of applicators), and disposal of hazardous substances. Follow all label instructions.
2. Develop a contingency plan for hazardous substance spills, including cleanup procedures and notification of the State Department of Environmental Quality.*

B. Pesticides and Herbicides

1. Use an integrated approach to weed and pest control, including manual, biological, mechanical, preventive and chemical means.*
2. To enhance effectiveness and prevent transport into streams, apply chemicals during appropriate weather conditions (generally calm and dry) and during the optimum time for control of the target pest or weed.*

APPENDIX B

2014 BMP FIELD REVIEWS REVIEWED SITES BY OWNERSHIP GROUP

SITE #	SITE NAME	COUNTY	OWNER	FIELD REVIEW TEAM
STATE-1	Split Creek	Missoula	Lubrecht	West
STATE-3	Butcher-Stewart	Lincoln	DNRC	Northwest
STATE-4	NE Smith	Flathead	DNRC	Northwest
STATE-5	West Prairie Salvage	Sanders	DNRC	West
STATE-6	Schoolhouse Sorts 1-5	Lincoln	DNRC	Northwest
STATE-7	Harvey Ridge Salvage	Granite	DNRC	West
STATE-8	Ride the Pine	Powell	DNRC	West
STATE-9	Hemorrhagic Richard	Beaverhead	DNRC	Central/East
FED-1	Rogers Pass Salvage	Lewis & Clark	BLM	Central/East
FED-2	South Tobacco Roots Phase 1	Madison	BLM	Central/East
FED-3	Martens Devil	Sanders	USFS	West
FED-4	Little Beaver IRSC	Sanders	USFS	West
FED-5	Eastshore Fuels Stewardship	Lake	USFS	Northwest
FED-6	Cooney-McKay	Lake	USFS	West
FED-7	Hay Mor Stewardship	Flathead	USFS	Northwest
FED-8	Round Bug	Flathead	USFS	Northwest
FED-9	Lower West Fork TS Sub 2	Ravalli	USFS	West
FED-10	Mystic-Lyons Road Haz Red	Dear Lodge	USFS	Central/East
IND-1	Stone Line	Gallatin	RY Timber	Central/East
IND-2	Strip Search	Lincoln	Stimson	Northwest
IND-3	Oneil Unit 7	Flathead	Stoltze	Northwest
IND-4	O'Neil 17 OSR 13	Flathead	Stoltze	Northwest
IND-5	Big Calico Line	Sanders	PCTC	West
IND-6	BP Shovel Line	Lincoln	PCTC	Northwest
IND-7	Fisher Mountain Line	Lincoln	PCTC	Northwest
IND-8	Line Skip	Lincoln	PCTC	Northwest
IND-9	Moore Granger	Flathead	PCTC	Northwest
IND-10	Red Hawk	Flathead	PCTC	Northwest
IND-11	Twin Meadow Line	Flathead	PCTC	Northwest
NIPF-1	Private	Flathead	PVT	Northwest
NIPF-2	Private	Granite	PVT	West
NIPF-3	Private	Missoula	PVT	West
NIPF-4	Private	Madison	PVT	Central/East
NIPF-5	Private	Jefferson	PVT	Central/east
NIPF-6	Private	Jefferson	PVT	Central/East
NIPF-7	Private	Missoula	PVT	West
NIPF-8	Private	Lewis & Clark	PVT	Central/East
NIPF-9	Private	Powell	PVT	Central/East
NIPF-10	Private	Missoula	PVT	West
NIPF-12	Private	Missoula	PVT	West
NIPF-13	Private	Granite	PVT	West
NIPF-14	Private	Lincoln	PVT	Northwest
State-2	Dropped	---	---	---
NIPF -11	Dropped	---	---	---

APPENDIX C

BMP FIELD REVIEW SITE INFORMATION FORM ALL OWNERSHIPS

A) Please complete this sheet for each site that meets minimum criteria (see page 2 for instructions).

B) Please attach a sale area map for each site. Highlight or otherwise identify new road construction and/or reconstruction and Streamside Management Zones.

C) All references to streams and Streamside Management Zones (SMZ) are based on SMZ Law and 2006 Rules update, (see attached sheet).

Minimum Criteria

- 1) Timber harvested during **Calendar Years 2008 and 2009 and**
- 2) Some portion of the sale (cutting unit) is located within 200 feet of a stream or an access road crosses a class I or class II stream, **and**
- 3) Minimum size of 5 harvested acres with 3,000 BF/acre (westside), or 1,500 BF/acre (eastside) actually harvested. Continental divide determines east and west sides.

Sale Name _____

Landowner Type (circle one) Federal NIPF Industry State

Landowner Name _____ Phone # _____

MHRA Attachment Yes No MHRA Holder Name _____

HRA Agreement Number _____ County _____

HRA Holder Name _____ Phone # _____

Legal Description Section _____ TWN _____ RNG _____

Acres Harvested _____ Primary Drainage _____

New Road Construction (Since 2003) Yes No Miles _____

Road Reconstruction/Deconstruction Yes No Miles _____

Slash Disposal Complete Yes ____ No ____

Average MBF Volume/Acre Removed From Harvested Area _____ MBF/Ac

New Stream Crossing Culvert Installation Yes No Number of crossings _____

Is new crossing on a fish bearing stream Yes No

Pre-Existing Stream Crossings On Access Road System Yes ____ No ____

Stream Within 200 Feet of a Harvest Unit Yes ____ No ____

Riparian (SMZ) Harvest Yes ____ No ____

Month/Year Harvest Conducted: From _____ To _____

Local Contact _____ Ph # _____

APPENDIX D

2014 BMP FIELD REVIEW TEAM MEMBERS

	NORTHWEST	WEST	CENTRAL / EAST
FISHERIES	Leo Rosenthal, DFWP Tom Weaver, DFWP	Shane Hendrickson, USFS Aubree Benson, USFS	Trevor Selch, DFWP
HYDROLOGY	Brian Sugden, PCTC	Gary Frank, DNRC	Mark Nienow, USFS Wayne Green, USFS Andy Efta, USFS
SOILS	Lou Kuennen, USFS Dean Sirucek, USFS Ret.	Wayne (Skip) Barndt	Don Kasten, BIA consulting with Bob Logar, NRCS
FORESTRY	Mark Boardman, Stoltze Allen Branine, DNRC Chris Damrow, Stoltze	Steve Hayes, BBER Neil Simpson, DNRC Rick Franke, SML	Don Kasten, BIA Dave Krueger, SML Dale Kirkvliet, BIA Nick Aschenwald, SML
ENGINEERING AND ROADS	Vic Andersen, PCTC	Beth Dodson, U of M Steve Hayes, BBER Rex Anderson, SML Gary Frank, DNRC	Rex Anderson, SML Jared Richardson, NWM Nick Aschenwald, SML Dale Kirkvliet, BIA Dale White, USFS
CONSERVATION		Harold Holden, CFC	Jared Richardson, NWM
NIPF/LOGGER		Debra Parker Foley, MFOA	Doug Mote, Mote Lumber Rex Anderson, SML
OBSERVER			Laura Andersen, DEQ

APPENDIX E

BMP FIELD REVIEW FORM

DS-49
Rev 1/04

BMP FIELD REVIEWS SITE INFORMATION

Site Number: _____

Meets Selection Criteria: Y/N _____
High Hazard: Y/N _____; Riparian _____ Matrix _____

Site Name: _____

Owner(s): _____

Legal Description: _____

County: _____

Primary Drainage: _____

Month/Year Harvested: _____

Stream Within 200 Ft.? Y / N

Name: _____

Bankfull Width: _____

Unit Size: _____

Volume Removed: _____

Road Construction: _____

Length: _____

Road Reconstruction: _____

Length: _____

Slash Disposal Complete: _____

Method: _____

Logging Method: _____

Slope: 0-5% _____; 5-20% _____; 20-40% _____; 40%+ _____

Parent Material: _____

Rating Guide

Soil Erodibility: High _____ Medium _____
Low _____

Harvest in SMZ: Y / N

Stream Class: _____

Comments:

APPLICATION
5—Operation Exceeds Requirements Of Bmp
4—Operation Meets Requirements Of Bmp
3—Minor Departure From Bmp
2—Major Departure From Bmp
1—Gross Neglect Of Bmp

EFFECTIVENESS
5—Improved Protection Of Soil And Water Resources Over Pre-Project Condition
4—Adequate Protection Of Soil And Water Resources
3—Minor And Temporary Impacts On Soil & Water Resources
2—Major And Temporary Or Minor And Prolonged Impacts On Soil And Water Resources.
1—Major And Prolonged Impacts On Soil And Water Resources.

DEFINITIONS (BY EXAMPLE)
Adequate—Small amount of material eroded;
Material does not reach draws, channels, or floodplain.
Minor—Erosion and delivery of material to draws but not stream.
Major—Erosion and subsequent delivery of sediment to stream or annual floodplain.
Temporary—Impacts lasting one year or less; no more than one runoff season.
Prolonged—Impacts lasting more than one year.

NR – Not Reviewed

NA – Not Applicable

FIELD AUDIT

Date: _____

Team Leader/Recorder: _____

Team Members:

Observers Present:

MONTANA FOREST PRACTICES REVIEW WORKSHEET

BMPs Applicable to:

- + New Road Construction
- # Existing Roads
- Reconstruction

RECOMMENDED BEST MANAGEMENT PRACTICES		APPLICABLE TO SITE (Y/N)			COMMENTS
		APPLICATION	EFFECTIVENESS		
SECTION III—ROADS					
<u>ROAD PLANNING & LOCATION</u>					
<u>SECTION III. A.</u>					
➤+	1a. Minimize number of roads necessary.				
#	1b. Use existing roads unless aggravated erosion.				
+	3. Avoid long, sustained, steep road grades.				
+	4. Locations avoid high-hazard sites (i.e., wet areas and unstable slopes).				
+	5a. Minimize number of stream crossings. Number _____.				
+	5b. Choose stable stream crossing sites.				
<u>ROAD DESIGN</u>					
<u>SECTION III.B.</u>					
➤+	2. Design roads to minimum standard necessary to accommodate anticipated uses.				
+	4. Vary road grade to reduce concentrated drainage.				
<u>ROAD DRAINAGE</u>					
<u>SECTION III. C.</u>					
+➤#	1. Provide adequate road surface drainage for all roads.				
+➤	2. Design ephemeral draw culverts with adequate length and size and to prevent erosion of fill. Minimum size 15", maintain cover.				
+➤#	3. Design all relief culverts with adequate length and appropriate skew. Protect inflow end from erosion. Catch basins where appropriate.				
+➤#	4. Install culverts at original gradient, otherwise rock armour or anchor downspouts.				
+➤#	5. Provide energy dissipaters at drainage structure outlets where needed.				
+➤#	7. Route road drainage through adequate filtration zones before entering a stream.				

MONTANA FOREST PRACTICES REVIEW WORKSHEET

BMPs Applicable to:

- + New Road Construction
- # Existing Roads
- Reconstruction

<u>CONSTRUCTION/RECONSTRUCTION</u> <u>SECTION III. D.</u>					
+➤	2. Stabilise erodible soils (i.e., seeding, benching, mulching).				
+➤	3. Provide effective sediment control on erodible fill slopes (ex. Slash filter windrow).				
+➤	5. Cut and fill slopes at stable angles. Slope ratio: _____.				
+➤	6. Avoid incorporating woody debris in road fill.				
+➤	8. Excess materials (waste) placed in locations that avoid entering stream.				
+➤	9. Sediment from borrow pits and gravel pits minimized.				
➤	10. Reconstruct only to the extent necessary to provide adequate drainage and safety.				
<u>ROAD MAINTENANCE</u> <u>SECTION III. E.</u>					
+➤#	1. Grade roads as necessary to maintain drainage.				
+➤#	2. Maintain erosion control features (dips, ditches and culverts functional).				
#	3. Avoid cutting the toe of cut slopes.				
+➤#	6. Avoid use of roads during wet periods and spring breakup.				
+➤#	8. Abandoned roads in condition to provided adequate drainage without further maintenance.				
SECTION IV – TIMBER HARVESTING					
<u>HARVEST DESIGN</u> <u>SECTION IV. A.</u>					
	2. Suitable logging system for topography, soil type and season of operation.				
	5. Design and locate skid trails to avoid concentrating runoff.				
	6. Suitable location, size, and number of landings.				

MONTANA FOREST PRACTICES REVIEW WORKSHEET

BMPs Applicable to:

+ New Road Construction

Existing Roads

> Reconstruction

<u>OTHER HARVESTING ACTIVITIES</u> <u>SECTION IV. B.</u>					
1a.	Skidding operations minimizes soil compaction and displacement.				
1b.	Avoid tractor skidding on unstable slopes and slopes that exceed 40% unless not causing excessive erosion.				
2.	Avoid operation of equipment within isolated wetlands.				
4.	Adequate drainage for landing.				
5.	Adequate drainage for skid trails.				
<u>SLASH TREATMENT AND SITE PREPARATION</u> <u>SECTION IV. C.</u>					
2.	Treat slash so as to preserve the surface soil horizon.				
4.	Scarify only to the extent necessary to meet resource management objective.				
5.	Activities limited to frozen or dry conditions to minimize soil compaction and displacement.				
6.	Equipment operations on suitable slopes only.				
8.	Limit water quality impact of prescribed fire.				
SECTION V – STREAM CROSSINGS					
<u>LEGAL REQUIREMENTS</u> <u>SECTION V. A.</u>					
➤+	1. Proper permits for stream crossings.				
<u>DESIGN CONSIDERATIONS</u> <u>SECTION V. B.</u>					
➤+	1a. Cross streams at right angles, if practical.				
➤+	1b. Direct road drainage away from stream crossing site.				
➤+	2. Avoid unimproved stream crossings.				

MONTANA FOREST PRACTICES REVIEW WORKSHEET

BMPs Applicable to:

+ New Road Construction

Existing Roads

> Reconstruction

<u>INSTALLATION OF STREAM CROSSINGS</u>					
<u>SECTION V. C.</u>					
>+	1. Minimize stream channel disturbance.				
>+	2. Stream crossing culverts conform to natural streambed and slope.				
>+	3. Proper sizing for stream crossing structures.				
>+	4. Prevent erosion of stream crossing culverts and bridge fills (i.e., armor inlet and outlet).				
>+	6. Minimum cover for stream crossing culverts provided.				
<u>EXISTING STREAM CROSSING</u>					
<u>SECTION V. D.</u>					
#	1. Culverts are maintained to preserve their hydrologic capacity. Adequate length to allow for road fill width. Rock armoring. Maintain fill over culvert.				
SECTION VII – HAZARDOUS SUBSTANCE					
<u>GENERAL</u>					
	1. Know and comply with regulations governing the storage, handling, etc. of hazardous substances.				
#	Project included road improvements to existing road system that reduced overall sediment delivery to streams.	Y/N Comment(s):			
+>#	Road system contains third party road systems.	Y/N Comment(s)			
ADDITIONAL COMMENTS:					

MONTANA FOREST PRACTICES REVIEW WORKSHEET

BMPs Applicable to:

+ New Road Construction

Existing Roads

> Reconstruction

STREAMSIDE MANAGEMENT ZONE SITE INFORMATION				
RECOMMENDED BEST MANAGEMENT PRACTICES				COMMENTS
1a. Adequate SMZ width maintained, avg. width _____.				
1b. SMZ properly marked?				
2. Exclusion of broadcast burning in SMZ.				
3. SMZ retention tree requirements met. (# of trees, representative of pre-harvest stand, favor bank-edge and leaning trees, shrubs and sub merchantable).				
4. Exclusion of equipment operation in SMZ except on established roads.				
5. Exclude construction of roads in the SMZ except when necessary to cross a Stream or wetland.				
6. Exclusion of road fill material deposited in SMZ except as needed to construct crossings.				
7. Exclusion of side-casting of road material into a stream, lake, wetland or other body of water during road maintenance.				
8. Exclusion of slash in streams, lakes or other bodies of water.				
9. Exclude the handling, storage, application or disposal of hazardous or toxic materials in the SMZ in a manner that pollutes or causes damage or injury.				
10. Pre-approved alternative practices				
11. DNRC approved site-specific alternative practices.				

ADDITIONAL COMMENTS:

APPENDIX F

FISH PASSAGE FIELD REVIEW FORM 2014

Date: _____

Field Review Site Name: _____

Field Review Site Number: _____

INSTALLATION OF STREAM CROSSINGS				
SECTION V. C.	COMMENTS			
2. Design stream-crossings for adequate passage of fish (if present) and ensure fish passage is not impeded.				
** Stream crossing type and/or structure modification (fords, baffles, bridges).				
a. Structure width accommodates bankfull width. <div style="margin-left: 40px;"> Bankfull width _____ Culvert width _____ Constriction ratio _____ </div>				
b. Structure slope mimics upstream and downstream slope <div style="margin-left: 40px;"> Channel slope _____ Culvert slope _____ Difference _____ </div>				
c. Structure retains <u>substrates</u> representative of the upstream and downstream reaches and/or design material. <div style="margin-left: 40px;"> % of culvert bottom with substrate _____ </div>				
d. Structure retains water depth representative of upstream and downstream reaches. <div style="margin-left: 40px;"> Channel water depth _____ Culvert water depth _____ Difference _____ </div>				
FISH PASSAGE SCORING TOTAL	Application to Site (Y/N)	Application	Effectiveness	OVERALL COMMENTS
Design stream-crossings for adequate passage of fish (if present) with minimum impact on water quality. Ensure fish passage is not impeded				

Application and Effectiveness Guidelines for 2014 Fish Passage BMP Field Reviews

Application Rating

Design Criteria	Rating Guidelines (Examples)	Application Rating
V.c.2.a. - structure <u>width</u> accommodates bankfull width	W_{struct} meets W_{bkf} (Constriction Ratio ≥ 0.9) ¹	MORE FAVORABLE
	W_{struct} slightly constricts W_{bkf} (Constriction Ratio 0.7 – 0.89) ²	↓
	W_{bkf} obviously not taken into consideration (Constriction Ratio < 0.5)	LESS FAVORABLE
V.c.2.b. - Structure <u>slope</u> mimics upstream and downstream slope	Structure placed at stream grade (within $\pm 1\%$) ²	MORE FAVORABLE
	Structure placed steeper/shallower than stream ($\pm 1\% - 3\%$)	↓
	Structure slope obviously not taken into consideration ($> \pm 5\%$)	LESS FAVORABLE
V.c.2.c. - Structure retains <u>substrates</u> representative of the upstream and downstream reaches and/or design material	Structure retaining material throughout the structure. (90-100%) ²	MORE FAVORABLE
	Structure retaining material throughout a portion of structure (10-90%)	↓
	No substrate being retained and substrate not taken into consideration.	LESS FAVORABLE
V.c.2.d. - Structure retains <u>water depth</u> representative of upstream and downstream reaches	Water depth representative of stream channel ²	MORE FAVORABLE
	Water depth slightly altered compared to stream channel ($< 50\%$ change in depth)	↓
	No surface water found within structure or excessive surface water	LESS FAVORABLE MORE FAVORABLE
1 - Constriction Ratio = structure width divided by bankfull width (ex. 5' culvert/10' stream width = 0.5) 2 – Representative of the natural stream channel outside the zone of crossing-structure influence.		

Application and Effectiveness Guidelines for 2014 Fish Passage BMP Field Reviews

Effectiveness Rating

Fish Passage	Rating Guidelines (Examples)	Rating
Design stream-crossings for adequate passage of fish (if present) with minimum impact on water quality. Ensure fish passage is not impeded	Not applicable or possibly in the case of a replacement	5 - Improved Passage
	No passage concerns for local species at any time of year	4 - Adequate Passage
	Passage concerns due to minor application departures	3 - Minor and temporary Passage Impediment
	Passage concerns due to major application departures	2 - Major and temporary Passage Impediment
	Passage concerns for both low and high water flow	1 - Major and Prolonged Passage Impediment

Field Review procedures and measurements:

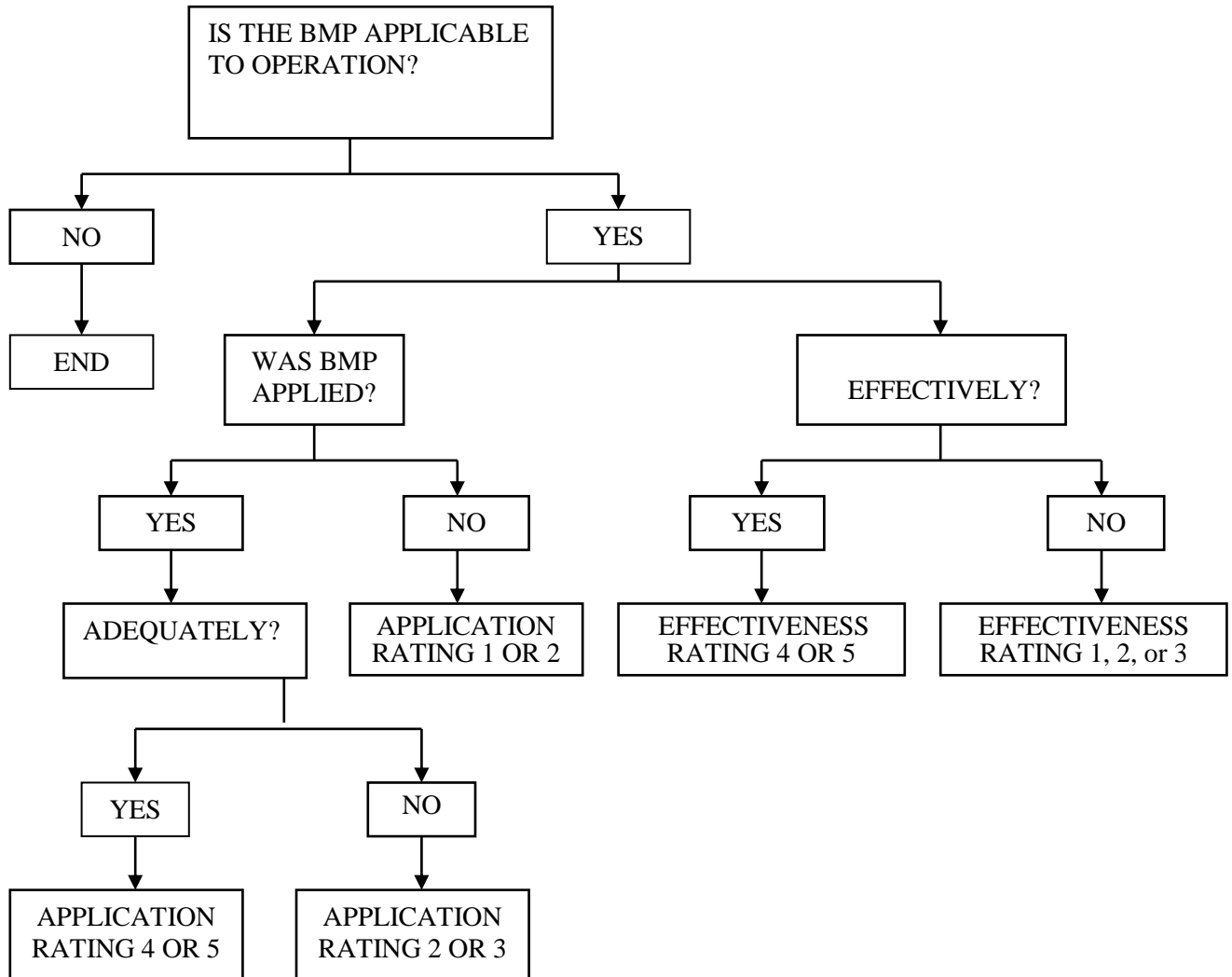
All measurements will be taken outside the zone of structure influence. (Except for culvert slope)

- Tape measurements of structure width and bankfull width.
 - Calculate constriction ratios (structure width/bankfull width)
 - Minimum of three measurements upstream and/or downstream at riffle sections, at bankfull width.
- Measurement of stream and structure slope (Clinometer)
 - Measure stream slope upstream and downstream of structure
 - Minimum of three measurements upstream and downstream, from riffle to riffle, measured in same direction.
- Substrate will be visually estimated, minimally
 - Keeping mind it is a human tendency to overestimate substrate size.
 - Consider substrates within 200 feet below and above structure. Estimate proportions of various size classes.
- Water depth will be measured with a wading staff
 - Minimum of three measurements upstream and downstream, measured at thalweg depth at bankfull width measure locations.

Detailed comments are required in order to elaborate and/or defend the effectiveness rating.

APPENDIX G

BMP FIELD REVIEW RATING FLOW CHART



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